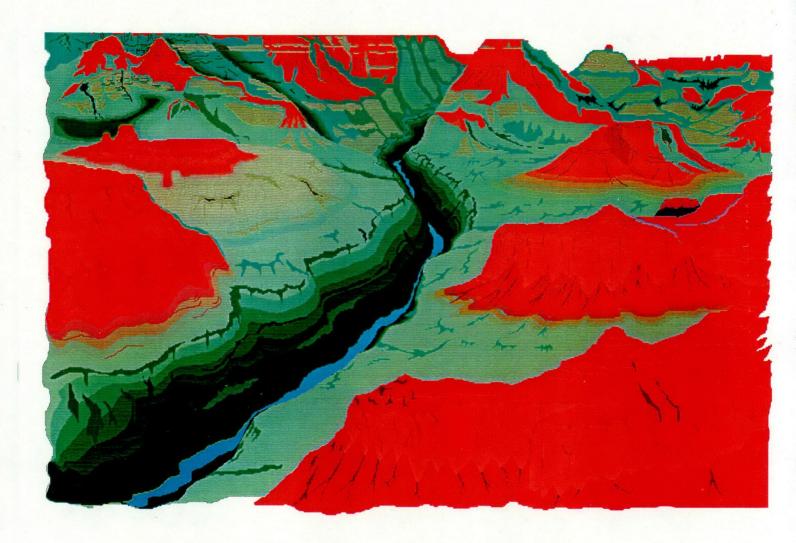
NATIONAL PARK SERVICE ENVIRONMENTAL RESOURCE MANUAL



Resource Manual for Environmental Management





National Park Service Environmental Resource Manual



Resource Manual for Environmental Management

prepared for EPA/NPS Partnership Project

U.S. Environmental Protection Agency, Region VIII
Office of Pollution Prevention
Marie B. Zanowick, Project Manager

National Park Service
Intermountain Field Area
Rocky Mountain and Colorado Plateau System Support Office
Michael Schene, Environmental Program Coordinator

developed by

Recom Applied Solutions, Incorporated
2919 West 17th Street, Suite 207

Longmont, Colorado 80503

developed by
TechLaw, Incorporated
303 Union Boulevard, Suite 510
Lakewood, Colorado 80228

"...Federal facilities will set the example for the rest of the country and become the leader in applying pollution prevention to daily operations, purchasing decisions and policies.... By stopping pollution at its source, the Federal government can make a significant contribution to protecting the public health and our environment."

President Clinton

Pollution prevention can be successful only with the commitment of park managers and the participation of all employees!!!

Environmental Management for the U.S. National Park Service, A Tool Kit for Environmental Management, and its companion document, National Park Service Environmental Resource Manual are prepared for use by the National Park Service.



Pollution prevention pays...





Senior Management Goals...

- Understand pollution prevention concept
- Embrace it as the core of all management/environmental decisions
 - · Develop full support from all employees

The information contained herein is believed to be accurate and reliable at the time of printing. Neither the authors, publisher, technical advisors, nor those who may distribute this publication are to be held accountable for the suitability of recommendations or for the performance of a system design, product, or procedure in particular applications, and they will not be liable if possible levels of waste reduction are not achieved. Furthermore, reference to trade names or specific commercial products, commodities or services does not constitute an endorsement or recommendation. Readers should thoroughly investigate any design, procedure, or product and independently conclude suitability or satisfactory performance before purchase or use.

This document was originally prepared in part under a contract with the U.S. Environmental Protection Agency, Region VIII.

Acknowledgements

Special Thanks to Yellowstone National Park

This document is the result of the NPS/EPA Partnership Project. The idea for this project was first developed in 1992 during a cooperative pollution prevention effort with Yellowstone National Park. Due to the forward thinking of Tim Hudson, Chief of Maintenance for Yellowstone, EPA Region VIII was invited to work within the Park to understand their environmental needs and to develop the expertise needed to undertake this project. Without the support of Mr. Hudson and his staff, this entire effort would not have been possible.

Thanks to the Rocky Mountain and Colorado Plateau Staff

The following individuals participated in the NPS/EPA Partnership training course "Pollution Prevention and Regulatory Compliance for the National Park Service." Their comments during the training were extremely valuable in defining the information needed in this manual. The authors of this document wish to acknowledge the contribution of Susan Garland, NPS Intermountain Field Area who coordinated the pollution prevention training sessions.

NPS personnel who made valuable contributions include Steve Ainslie, Marcelino Aldaz, Eddie Aragon, Clifford L. Arbogast, Jr., Michael Baker, Howard Bartley, Raymond Begay, Willie B. Begay, Fred Bolenske, Pam Bourgeois, Steve Budd-Jack, Erika Campos, Ron Clayborn, Chris Cline, Danny Cornell, Jim Dahlberg, William Dale, Frank Darcey, Michael J. Davin, Jackie DiMessen, Howard Dimont, Don Durbin, Shirley Fairbanks, Kathy Fiero, Phil Fillbright, Mindy Gallaher, Jeff Glanzer, Leonard Gonzales, Lou Good, Pat Goss, Richard Greenlee, Craig Hartlise, Bill Havland, Marylynn Heath, Steve Hunt, Marlene Igo, Kee Charlie John, Penny Jones, Guy Keene, John King, Robert H. King, Ted Koppenhafer, Jay Kratz, Gerald Lange, Larry L. Lewis, Timothy S. Lindsay, Judie Maserman, Tom Mason, Paul McCann, John McDill, Mike McGinnis, Mike McWright, Bill Miles, Jim Nepstad, Rick Nichols, Sue O'Conner, Jim O'Sickey, Tim Oliverius, Pierre Perney, Jim Perry, Doah Poolheco, Dan Resmondo, Don Robinson, Erin Rodieck, Bruce Rogers, Jed Simon, Terry Saunders, Dale Scheier, Dutch Scholten, Rick Shireman, Rande Simon, Tom Snorke, Dixie Sparks, Larry Stout, Frank L. Tafoya, Linda Towle, Gene Trujillo, Raymond Vialpando, Bruce Wadlington, Bill Wallner, Dave Walton, Bob Wemple, Don Whyte, Alan Williams, and Steven L. Willis.

In addition, a special thanks to the Front Range Community College students who conducted over 50 pollution prevention assessments of the Rocky Mountain and Colorado Plateau Cluster Parks: John DiCiacco, Avery Freeman, Janet L. Klein, Charlotte Plaut, and Barbara Wolf.

The authors gratefully acknowledge Marie Zanowick, U.S. Environmental Protection Agency Region VIII, for her insightful and valuable contributions to this document, without whose assistance and encouragement this document would not have been completed.

Table of Contents

		agements	
		Contents	
		s Resource Manual	.viii
Poll	lution	Prevention Program: Environmental	
	Mana	agement System	i×
I	Envir	onmental Contacts	1
11.	GSA	Supply Service Information	8
III.		onmental Resources	
	1.	Air Cleaning and Purifying	.14
	2.	Antifreeze Recycling Companies	
	3.	Antifreeze Recyclers	
	4.	Asbestos Abatement, Control, and Testing	17
	5.	Automotive Refrigerant Reclamation Systems	
	6.	Battery Recycling	
	7.	Cleaning Solvents and Parts Washers	
	8.	Drum and Drum Crusher Dealers	
	9.	Energy Conservation and Management	
	10.	Hazardous Waste Disposal	
	11.	Industrial Laundries	
	12.	Paint Solvents and Solvent Recovery Units	26
	13.	Recycling Services	27
	14.	PCB Handling and Disposal	28
	15.	Storage Tanks	29
	16.	Waste Oil Burning Furnaces and Heaters	30
	17.	Waste Oil Haulers	31
IV.		onmental Management Issues	
	1.	What are Hazardous Wastes?	
	2.	Toxicity Characteristic Leaching Procedure	
	3.	Hazardous Waste Generator Rules	46
	4.	Obtaining a U.S. Environmental Protection Agency	
	_	Identification Number	
	5.	Hazardous Waste Accumulation and Storage Limits	
	<u>6</u> .	Shipping Hazardous Waste Off-Site	54
	7.	Container Labeling and Other Forms of Warning	
	8.	EPA Hazardous Waste Numbers (Codes)	
	9.	Polychlorinated Biphenyls (PCBs)	
	10	Potential Problem Products	
	11.	Material Safety Data Sheets	
	12 .	Chemical Hazard Communication Program	
	13.	Health Hazards	
	14.	Preparing for and Preventing Accidents	
	15.	Planning for Emergencies	83
	16.	Sample Environmental Policy Statements	84
	17.	Aerosol Spray Cans: An Alternative	85

N	ition	aÌ	Park	Sa	mzica
116	1111111	aı	Iain	V) [-	1 1 1 1 1 1

V	Land Management Issues				
	1.	Xeriscape	8		
		Herbicides, Pesticides, and Insecticides9			
VI	Supp	porting Information99	9		
		Definitions			
	2.	Abbreviations and Acronyms	.0		
		Pollution Prevention and Environmental Assistance			

"It's not easy being green."

Kermit the Frog, Sesame Street

Using This Resource Manual

This Resource Manual was prepared for the use by national parks in the eight states of the National Park Service (NPS) Intermountain Field Area – Arizona, Colorado, Montana, New Mexico, Oklahoma, Texas, Utah, and Wyoming. It contains listing of the names, addresses, telephone and facsimile numbers, of equipment and product suppliers and service providers. These contacts may be of value as you search for the most economical and efficient means to minimize your wastes and properly care for those wastes that are unavoidable at this time. It also has provisions for you to add your own contacts if they are not listed. Each contact is listed with its principle area of coverage within the eight states. This document, and its companion publication discussed below, are the result of the Interagency Agreement between the NPS Intermountain Field Area and U.S. Environmental Protection Agency, Region VIII in the pursuit of the NPS Park Environment 2000 initiative.

Park Environment 2000

The National Park Service is committed to the reduction and/or elimination of hazardous materials and wastes for all parks under its jurisdiction. To achieve this commitment, the NPS Intermountain Field Area developed an initiative entitled Park Environment 2000.

The goal of the Park Environment 2000 Initiative is to reduce or eliminate the generation of solid and hazardous wastes in every park, including any such wastes currently generated by park concessionaires.

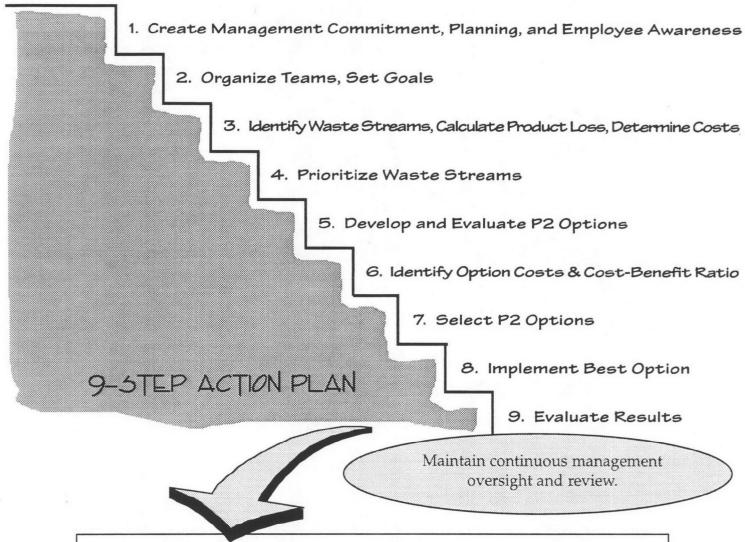
The NPS and the U.S. Environmental Protection Agency

With Park Environment 2000 as the objective, there has been a concentrated effort to bring a new awareness to national park employees throughout the NPS Intermountain Field Area. This has included special training, park pollution prevention assessments, and a series of environmental management documents. This effort has been accomplished through an Interagency Agreement between the NPS and the EPA, Region VIII.

The NPS Intermountain Field Area Environmental Management Tool Kit

As a part of the interagency agreement between NPS and EPA, an Environmental Management tool kit was developed around the most common wastestreams found at these parks. This tool kit describes each wastestream, identifies a series of possible ways to reduce or eliminate this wastestream, and presents an overall approach for the development of an on-going environmental management program. This tool kit is available to all parks and should be used as a companion to this resource manual.

POLLUTION PREVENTION PROGRAM: ENVIRONMENTAL MANAGEMENT SYSTEM



The 9-Step Environmental Management System Action Plan can be used to guide you through your Park Environment 2000 activities. It is an organized sequence of actions that can be followed to ensure that you include everything you need to be successful. The first two steps are basic to your organization, regardless of the number and magnitude of waste streams. Steps three through nine are best tailored for each major waste stream, process, or subprocess. Feel free to shape these last steps in an iterative manner to avoid taking on too much. All nine steps ensure that you have a system in place for continuous oversight and improvement.



Environmental Contacts: Pollution Prevention and Compliance

1.	Arizona Department of Environmental Quality Pollution Prevention Program	(602) 207-4210
2.	Colorado Pollution Prevention Coordinator Colorado Department of Public Health and the Environment	(303) 692-3009
3.	Montana Pollution Prevention Coordinator Montana State University Extension Service	(406) 994-3451
4.	New Mexico Pollution Prevention Hazardous Waste Bureau	(505) 827-1557
5.	Texas Office of Pollution Prevention and Conservation	(512) 458-7111
6.	Utah Pollution Prevention Coordinator Utah Department of Environmental Quality	(801) 536-4477
7.	Wyoming Pollution Prevention Coordinator Wyoming Department of Environmental Quality	(307) 777-6105
8.	Environmental Protection Agency, Region VI Pollution Prevention Program, Regional Office	(214) 655-6444
9.	Environmental Protection Agency, Region VIII Pollution Prevention Program	(303) 312-6384
10.	Environmental Protection Agency, Region IX Pollution Prevention Program	(415) 744-2192 (415) 744-2190
11.	General Services Administration for Environmentally Preferable Products	(800) 848-8928 (206) 931-7109
12.	CERCLA National Response Center	(800) 424-8802
13.	Resource Conservation and Recovery Act (RCRA) and Superfund Hotline	(800) 424-9346



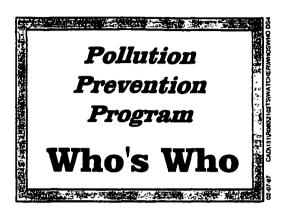
REGION 8

Pollution Prevention Program (8P2-P2)

Office of Pollution Prevention, State and Tribal Assistance U.S. Environmental Protection Agency, Region 8 999 18th Street, Suite 500 Denver, Colorado 80202

Denver, Colorado 8020 (303) 312-6384

(303) 312-6741 fax





hidinger.jack@epamail.epa.gov

Jack Hidinger (303) 312-6387

P2 Program Leader

- Sustainable Development,
- Project XL,
- ISO 14000,
- · Green Lights,
- · Solid Waste,
- Recycling



allen.gerald@epamail.epa.gov

Gerald Allen (303) 312-7008

- Solid Waste Management for Regional States and Tribes,
- Green Lights,
- Solid Waste Grants



donnelly.george@epamail.epa.gov

George Donnelly

- (303) 312-6193
- Energy Star,Green Lights,
- Waste Wise,
- Municipal Solid Waste



farris.laura@epamail.epa.gov

Laura Farris (303) 312-6189

- Strategic Planning, Technology Innovation,
- Climate Change,
- Environmental Education



heskett.carl@epamail.epa.gov

Carl Heskett (303) 312-6492

- Wyoming PPIS,
- P2 Agriculture,
- South Platte Watershed
- Pollution Prevention



houck.janet@epamail.epa.gov

Janet Houck (303) 312-6493

Janie Olsen

(303) 312-6384 • P2 Support Staff

- Pollution Prevention Reference Library,
- Pollution Prevention
 Database System,
- Recycling Development Market Team,
- Freedom of Information



Ernie Lombardi (303) 312-6388

- Federal Facilities Pollution Prevention Assessments,
- Environmental

 Management Reviews,
- Inspection and Enforcement Action Tracking and Reporting,
- FEDPLAN Environmental Planning Reviews



olsen janie@epamail.epa.gov

. . . 6 "



lombardi.emie@epamail.epa.gov

schaller.david@epamail.epa.gov

Dave Schaller (303) 312-6146

• Sustainable Development



thiel.dianne@epamail.epa.gov

Dianne Thiel (303) 312-6389

- Federal Facilities
 Pollution Prevention
 Programs,
- Display for Products Made with Recycled Content,
- Environmental

 Management Reviews



Whitney Trulove-Cranor (303) 312-6099

- Recycling Market Development,
- Project XL,
- ISO 14000
- EPA Green Team



Linda Walters

Tribal Initiatives,

Team,

Judy Wong

(303) 312-6390

Green Lights, **Pollution Prevention** Partnership

 Multimedia Pollution Prevention Assessments, · Municipal Solid Waste,

 Pollution Prevention Incentives for state Grants,

• Tribal Solid Waste Grants for Utah and South Dakota,

• 1997 Roundtable Committee, Environmental Justice &

Pollution Prevention Grants, Sustainable Development Challenge Grants, • Regional Implementation

Recycling Committee Team

(303) 312-6385

walters.linda@epamail.epa.gov



trulove-cranor.whitney@epamail.epa.gov

Patty Weimerskirch (303) 312-6263

• Green Lights



wong.judy@epamail.epa.gov



Marie B. Zanowick (303) 312-6403

- Hazardous Waste Minimization,
- Mining Waste,
- · Vehicle Maintenance,
- NPS/EPA Partnership Project,





zanowick@csn.net

• Wyoming Refinery

U.S. Environmental Protection Agency Regional Offices

U.S. EPA, Region VI 1445 Ross Avenue 12th Floor, Suite 1200 Dallas, Texas 75202-2733 (214) 665-6444 New Mexico, Oklahoma, Texas

U.S. EPA, Region VIII 999 18th Street, Suite 500 Denver, Colorado 80202-2466 (303) 312-6312 Colorado, Montana, Utah, Wyoming

U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105
(415) 744-1305
Arizona

State Hazardous Waste Management Agencies

Arizona

Arizona Department of Health Services Office of Waste Programs 3033 North Central Avenue Phoenix, Arizona 85012 (602) 207-4108

Colorado

Colorado Department of Public Health and Environment
HMWMD-HWC-B2
4300 Cherry Creek Drive, South
Denver, Colorado 80222-1530
(303) 692-3300

Montana

Department of Health and Environmental Services
Solid and Hazardous Waste Bureau
Cogswell Building
Helena, Montana 59620
(406) 444-1430

New Mexico

Environmental Improvement Division Hazardous Waste Bureau 525 Camino De Loss Marquez Santa Fe, New Mexico 87501 (505) 827-1557

Oklahoma

Department of Environmental Quality
Hazardous Waste Quality Management Service
1000 Northeast 10th Street
Oklahoma City, Oklahoma 73117-1212
(405) 271-5338

Texas

Industrial and Hazardous Waste Division
Waste Evaluation Section
Post Office Box 13087, Capitol Section
1700 North Congress
Austin, Texas 78711-3087
(512) 908-6832

Utah

Department of Environmental Quality Division of Solid and Hazardous Waste Post Office Box 144880 Salt Lake City, Utah 84114-4880 (801) 538-6170

Wyoming

Wyoming Department of Environmental Quality Solid and Hazardous Waste Division 122 West 25th Street Cheyenne, Wyoming 82002 (307) 777-6105

II. General Services Administration

Environmental Products



The General Services Administration (GSA) offers many environmentally oriented products and services to the Federal sector. Various environmental laws, regulations and related executive orders have affected the number and range of these products and services. GSA's efforts, in concert with these directives, are aimed at minimizing waste, conserving energy and water, and preventing or reducing pollution. The GAS Supply Catalog contains over 3,000 environmental items and hundreds more are available through the Federal Supply and New Item Inventory Schedules and the Customer Supply Centers.

Recycled and Recycled Content Products

GSA offers over 1,000 recycled and recycled content products, including a variety of office and other paper supplies. The office items include bond, copier, writing and art/drafting papers, envelopes, notebooks, index cards, labels, calenders and file folders. Other items include toilet paper and paper towels, some of which are unbleached and contain 100% post consumer recovered materials, as well as recycled cardboard boxes and toner cartridges.

Also available in the system are rubber mats, thermal building insulation, and retread tires. Some newer items include recycled paint and shipping pallets and park benches and tables made from recycled plastic.

Where possible, buy recycled and recycled content products. Your actions help to close the loop on the entire process of recycling. GSA is striving to set the example in this area, by encouraging the collection of recyclable materials through the Federal Recycling Program, and by making available recycled items and items that contain recovered materials. In many cases, these products meet the mandate to buy recycled and recycled content products.

Energy Conservation

To conserve energy, GSA offers several items:

- Energy Efficient Household appliances, many in both gas and electric models including refrigerators, freezers, ranges, washers and dryers, dish washers, and window air conditioners.
- Lighting fixtures and controls.
- Motion and occupancy sensors which turn off lights when not being used.
- Energy management systems.
- Showerheads that provide fixed or variable restricted flow control for water conservation.
- Under the project name, Energy Star Computer Program, GSA makes computers and printers available that are designed to power down or "sleep" when not in use.

Paints and Chemicals

In an effort to help prevent and reduce pollution, GSA has reformulated hundreds of its marine and architectural paints and coatings to eliminate or reduce harmful ingredients, such as: volatile organic compounds (VOCs); ozone depleting substances (ODS), chromate, mercury and lead. Water and citrus-based industrial cleaner and degreaser alternatives are offered as well.

Hazardous Waste

To promote and improve environmental and public safety concerning the subject of hazardous materials, GSA offers products, equipment and services related to the recovery, recycling, and disposal of hazardous wastes.

GSA Federal Supply Service - Environmental Products Guide

The Environmental Products Guide, prepared by the GSA Federal Supply Service, was designed to help Federal civilian and military agencies identify the environmentally oriented products and services available to them through their supply system. The guide contains more than 3,000 such items, with more than 1,000 of them employing recycled content paper products alone. Some of the items contain 100% postconsumer material (PM) and all applicable items meet or exceed guideline requirements established by the U.S. Environmental Protection Agency (EPA) and/or addressed in Executive Order 12873.

Defense Supply Center Richmond - Energy Efficient Lighting

The Defense Supply Center Richmond (DSCR) has released its fourth energy efficient lighting catalog. The Energy Policy Act and Executive Order 12902, has mandated that from the base year of 1985, all Federal buildings must reduce energy consumption by 20% in the year 2000, and by a total of 30% in the year 2005. One of the largest energy uses in Federal buildings is lighting systems, which can be improved by installing energy efficient lighting. This catalog has numerous items that can be a part of your energy efficiency efforts in your overall pollution prevention program. It is also a great resource for technical information with cross-references from traditional lighting products to today's more efficient items.

Defense Supply Center Richmond - Environmental Products

The DSCR has released a second edition of environmental products, including chemical alternatives, recyclers, aircraft cleaners, and much more. These products have been selected on the basis of their overall impact in reducing the use of regulated chemicals, thus reducing hazardous wastes, eliminating the use of ozone depleting chemicals, and of course protecting employees. Some of the more common substitutes found in this catalog are for methyl ethyl ketone (MEK), perchloroethylene (Perc), 1,1,1-trichloroethane (TCA), and trichloroethylene (TCE).

General Services Administration

Environmental Products

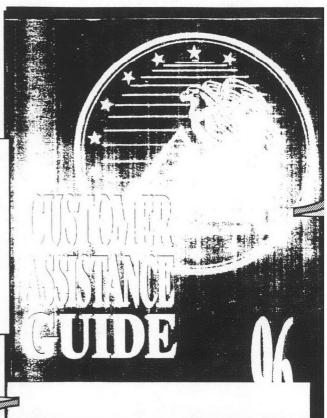
Customer Assistance Guide 1996



A Source of Environmental Products

The General Service Administration (GSA), the Federal Supply System (FSS), and the Defense Supply Center Richmond (DSCR) are great sources of products that meet today's pollution prevention challenges. These products are available to Federal civilian and military agencies through their normal supply system.

Get Thie Catalog by Calling (703) 305-6477

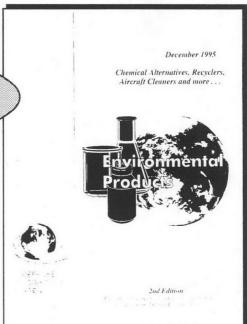


December 1995

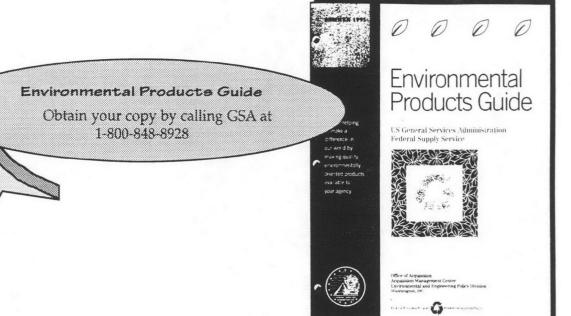
Environmental Products

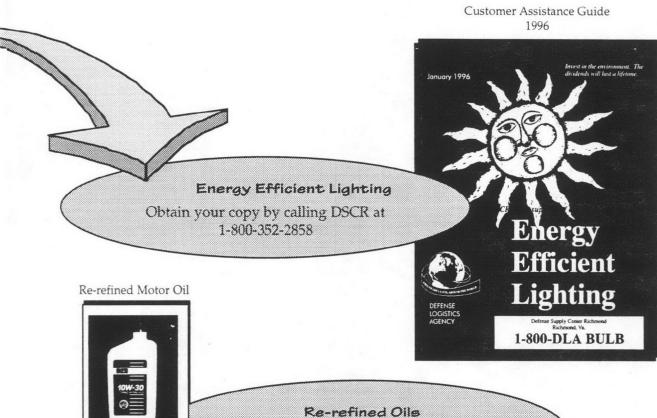
Environmental Products

Obtain your copy by calling DSCR at (616) 961-4958



Environmental Products Guide Summer 1995





Obtain more information by calling DSCR at 1-800-345-6333

Environmental Resource Manual

III. Environmental Resources

1.	Air Cleaning and Purifying
2.	Antifreeze Recycling Companies
3.	Antifreeze Recyclers
4 .	Asbestos Abatement / Control and Testing
5.	Automotive Refrigerant Reclamation Systems
6 .	Battery Recycling
7 .	Cleaning Solvents and Parts Washers
8.	Drum and Drum Crusher Dealers
9.	Energy Conservation and Management
10 .	Hazardous Waste Disposal24
11.	Industrial Laundries
12 .	Paint Solvents and Solvent Recovery Units
13.	Recycling Services
14 .	PCB Handling and Disposal
15 .	Storage Tanks
16.	Waste Oil Burning Furnaces / Heaters
17 .	Waste Oil Hauling Companies

...add your local contacts to the lists in the following pages as well.

1. Air Cleaning and Purifying

Air Sentry Dust Collectors 460 East 76th Avenue Denver, Colorado (303) 458-8333 Air Treatment Systems, Incorporated 4970 Monaco Boulevard, Unit C Commerce City, Colorado (303) 289-5936

American Medco 111 West Evans Avenue Denver, Colorado (303) 934-6100 Honeywell Electronic Air Cleaners 3901 Nome Denver, Colorado (303) 371-6463

2. Antifreeze Recycling Companies

Note: These companies recycle antifreeze off-site.

A&I Distributors of Billings

Billings, Montana 59101 (406) 245-6443

Arrow Recycling Post Office Box 1676 Mills, Wyoming 82644 (307) 472-5543

ASAP Radiator Post Office Box 876 Casper, Wyoming 82602 Gillette Radiator Post Office Box 1236 Gillette, Wyoming 82717 (307) 686-7622

Magnum Oil

Butte, Montana (406) 782-8397

Oil Filter Company 1410 SW 3rd Street Oklahoma City, Oklahoma 73108 (405) 232-3411

Preferred Reduction Services 977 South 700 West Salt Lake City, Utah 84101 (801) 973-2220 Tri-State Recycling Services Post Office Box 790 Newcastle, Wyoming 82701 (1-800) 876-8645

3. Antifreeze Recyclers

Note: These companies provide on-site recycler units.

FPPF 117 West Tupper Street Buffalo, New York 14201-2193 (1-800) 735-3773 Goodall Manufacturing Company 7558 Washington Avenue South Eden Prairie, Minnesota 55344 (1-800) 328-7730

Inesco 1460 South 400 West Salt Lake City, Utah 84115 (801) 487-4221 Kleer-Flo Company 15151 Technology Drive Eden Prairie, Minnesota 55344 (1-800) 328-7942 (612) 934-7942 FAX

ROBINAIR Robinair Way Montpelier, Ohio 43543-0193 (419) 485-5561 Industrial Air of Texas 900 West Interstate 20 Arlington, Texas 76017 (817) 465-8545

4. Asbestos Abatement, Control, and Testing

Asbestos Technology & Consulting

Boulder, Colorado (1-800) 732-7670

Havelick & Associates Ltd. 11925 Quay Broomfield, Colorado (303) 466-9305

ATS - Asbestos Transport System 5780 Hooker Denver, Colorado (303) 433-0641 Mountain States Asbestos Removal 7741 East Gray Road Scottsdale, Colorado (303) 951-9080

5. Automotive Refrigerant Reclamation Systems

Major Diversities, Incorporated 5601 Gray Street Arvada, Colorado 80020 (303) 423-1391 Industrial Air of Texas 900 West Interstate 20 Arlington, Texas 76017 (817) 465-8545

Matco Tools Corporation 4403 Allen Road Stow, Ohio 44224 (1-800) 331-2427

6. Battery Recycling

Car-Go Batteries Denver, Colorado (303) 296-8763 Mercury Refining Company 1-800-833-3505

Rocky Mountain Batteries Wheat Ridge, Colorado (303) 423-7142 Rechargeable Battery Recycling Corp. 1-800-822-8837

INMETCO 245 Poriersville Road Ellwood City, Pennsylvania 16117 (412) 758-2802

7. Cleaning Solvents and Parts Washers

BioGenesis Enterprises, Incorporated 2466 South 99th Street Milwaukee, Wisconsin 53227 (414) 321-8509 (414) 321-8609 FAX Brody Chemical 4825 South 6200 West Salt Lake City, Utah 84118 (801) 963-2436

Chemcentral 2465 South 1100 West Woods Cross, Utah 84087 (801) 292-0437 Dychem International 425 North 400 West Salt Lake City, Utah 84103 (801) 292-0437

ETUS 1511 Kastner Place Sanford, Florida 32771 (407) 321-7910 (407) 321-3098 FAX Ecolink 1094 Cudahy Place, Number 218 San Diego, California 92110 (619) 276-6476 (619) 276-6479 FAX

Environmentally Safe Products Corporation 2100 Road to Six Flags East Arlington, Texas 76011 (817) 275-5533 Fremont Industries 4400 Valley Industrial Boulevard, N Shakopee, Minnesota 55379 (612) 445-4121 (612) 496-3027 FAX

7. Cleaning Solvents and Parts Washers (cont)

Heatbath Corporation Post Office Box 2978 Springfield, Massachusetts 01102-2978 (413) 513-3381 Inesco 1460 South 400 West Salt Lake City, Utah 84115 (801) 487-4221

Kleer-Flo Company 15151 Technology Drive Eden Prairie, Minnesota 55344 (1-800) 328-7942 (612) 934-7942 Safety-Kleen Corporation 880 East County Club Road Gering, Nebraska 69341 (308) 436-2600

Solvent Kleene, Incorporated 131 1/2 Lynnfield Street Peabody, Massachusetts 01960 (508) 531-2279 (508) 532-9304 FAX TABCO 940 West 100 South Salt Lake City, Utah 84104 (801) 595-0119

TEXO Corporation 2801 Highland Avenue Cincinnati, Ohio 45212 (1-800) 998-8396 (513) 731-8113 FAX The Brulin Corporation Post Office Box 270 Indianapolis, Indiana 46206 (1-800) 776-7149

8. Drum & Drum Crusher Dealers

Western Container
Post Office Box 481063
Denver, Colorado 80214-1063
(303) 295-0404
(303) 295-6232 FAX

Greif Brothers Corporation 3963 Walnut Street Denver, Colorado 80205 (303) 297-9901 (303) 297-9907 FAX

S&G Enterprises, Incorporated 14115 West 19000 Edison Drive Germantown, Wisconsin 53022 (414) 251-8300

9. Energy Conservation and Management

E Source 1033 Walnut Boulder, Colorado (303) 440-8500 Green Technologies, Incorporated 5490 Spine Road Boulder, Colorado (303) 581-9600

Altresco, Incorporated 600 South Cherry Denver, Colorado (303) 320-8306 Keplinger & Associates, Incorporated 1200 Milam Street Houston, Texas (303) 832-1602

- Note: 1. Also consider contacting your local Department of Energy Industrial Assessment Center (e.g., Colorado State University in Fort Collins, Colorado) for technical assistance in energy audits and energy conservation ideas.
 - 2. See GSA supply information (page 6) for listing of Greenlights companies and Defense Supply Center Richmond catalogs.

10. Hazardous Waste Disposal

Van, Waters & Rogers Chem Care Post Office box 5287 Denver, Colorado 80217-5287 (303) 388-5651 Ashland Chemical, Incorporated 9131 East 96th Avenue Englewood, Colorado 80110 (303) 789-1887

World Environmental 511 Orchard Street Golden, Colorado 80401 (303) 271-3737 Allwaste Environmental Services 15065 West 44th Avenue Denver, Colorado (303) 279-5506 or (303) 278-1858

Western Environmental Technologies, Inc. 1800 West Littleton Boulevard Denver, Colorado (303) 795-2500

11. Industrial Laundries

G&K Services, Incorporated 5100 Race Street Denver, Colorado 80216 (303) 297-1533 American Industrial Service 1850 South Acoma Denver, Colorado (303) 722-4661

American Linen 5090 Cook Denver, Colorado (303) 295-7631 National Linen Service 3850 Elm Denver, Colorado (303) 388-5391

12. Paint Solvents and Solvent Recovery Units

Paint Solvents

Ecolink 1094 Cudahy Place, Number 218 San Diego, California 92110 (619) 276-6476 (619) 276-6479 FAX Painter's Supply Company 3701 South Santa Fe Drive Sheridan, Colorado 80110 (1-800) 275-2448

Solvent Kleene, Incorporated 131 1/2 Lynnfield Street Peabody, Massachusetts 01960 (508) 531-2279 (508) 532-9304 FAX

Solvent Recovery Units

Painter's Supply Company 3701 South Santa Fe Sheridan, Colorado 80110 (1-800) 275-2448 Solvent Kleene, Incorporated 131 1/2 Lynnfield Street Peabody, Massachusetts 01960 (508) 531-2279 (508) 532-9304

13. Recycling Services

Cornell Metal Recycling 395 East Rogers Road Longmont, Colorado (303) 651-3493 Green Mountain Recycling Services Post Office Box 1096 Boulder, Colorado (303) 442-7535

Arapahoe Resource Recovery 7120 South Jordan Road Englewood, Colorado (303) 680-7533

BFI Recycling Systems 5590 East 55th Avenue Commerce City, Colorado (303) 287-8040

Duwald Steel Corporation 1100 Umatilla Denver, Colorado (303) 623-6238 Weyerhauser Paper Company 5135 Race Court Denver, Colorado (303) 297-2312

Eco-Cycle 5030 Pearl Street Boulder, Colorado 80304 (303) 444-6634 Waste Management of Colorado 2400 West Union Avenue Englewood, Colorado 80110 (303) 797-1600 (303) 794-2403 FAX

Note: Don't forget to call your state recycling coordinator for additional suggestions – you can reach them through your state's pollution prevention coordinator.

14. PCB Handling and Disposal

Commercially Permitted PCB Incinerators (June 1993)

Aptus, Incorporated Post Office Box 1328 Coffeyville, Kansas 67337 (316) 251-6380 Aptus, Incorporated Aragonite, Utah (801) 266-7787

Chemical Waste Management Post Office Box 2563 Port Arthur, Texas 77643 (409) 736-2821 Chemical Waste Management Environmental Energy Group Post Office Box 50764 Denton, Texas 76206 (817) 383-3632 or (817) 868-1291

Ballast Recycling Services

Alta Resource Management Services, Inc. 88-B Industry Avenue Springfield, Massachutts 01104-9926 1-800-730-2582 or (413) 734-3399

Dynex Environmental Incorporated 6801 Industrial Loop Milwaukee, Wisconsin 53129 1-800-249-3310 or (414) 421-4959

Eastern Environmental Technologies Portchester, New York (914) 934-2100 FulCircle Ballast Recyclers
509 Manida Street
Bronx, New York 10474
1-800-581-0857
(718) 328-4462 FAX

15. Storage Tanks

Accutank Testing Corporation 333 South Cherokee Denver, Colorado (303) 722-0700 Tank Disposal, Incorporated 2090 East 104th Avenue Thornton, Colorado (303) 280-9734

Underground Storage Technology 6794 Welch Court Arvada, Colorado (303) 4203603 Waste Engineering, Incorporated 2430 Alcott Street Denver, Colorado (303) 433-2788

Enviro-Care Tank System 2650 South Delaware Street Denver, Colorado 80223 (1-800) 797-9974 or (303) 777-4122 JoaQuin Manufacturing Corporation 6900 Elm Drive Commerce City, Colorado 80022-1844 (1-800) 783-7060

16. Waste Oil Burning Furnaces and Heaters

Clean Burn, Incorporated 83 South Groffdale Road Leola, Pennsylvania 17540 (1-800) 331-0183 INOV8, Incorporated 1240 Clinton Street La Crosse, Wisconsin 54603 (608) 785-2876

Inesco 1460 South 400 West Salt Lake City, Utah 84115 (801) 487-4221 Lanair 2347 Kettering Street Janesville, Wisconsin 53546 (1-800) 753-1601 (608) 757-7878 FAX

Reznor 1555 Lynnfield Road Memphis, Tennessee 38119 (1-800) 695-1901 Shenandoah Manufacturing Company Post Office Box 839 Harrisonburg, Virginia 22801-0839 (1-800) 476-7436

17. Waste Oil Haulers

A&H Services, Incorporated Post Office Box 722 Mooreton, North Dakota 58061 (701) 274-8816

Advanced Petroleum Recycling Co. Post Office Box 16747 Salt Lake City, Utah 84116-0747 (801) 364-9444

Approved Oil Service, Incorporated 5390 East 72nd Avenue Commerce City, Colorado 80022 (303) 287-2807

Area Pump and Re-Cycle 124 Highway 200 South Glendive, Montana 59330 (406) 365-3115

Asphalt Express, Incorporated Post Office Box 26453 Salt Lake City, Utah 84126 (801) 972-6033 Bennett's Economy Sanitation 160 East Helm Avenue Salt Lake City, Utah 84115 (801) 266-1559

Brand Precision Services, Incorporated 6151 Executive Boulevard Huber Heights, Ohio 45424 (513) 237-1097 Casper Radiator Post Office Box 325 Mills, Wyoming 82644 (307) 234-5764

Chemical Conservation Corporation 653 Rocket Boulevard Orlando, Florida 32824 (407) 859-4441 Dennis White Trucking, Incorporated 11192 South Trent Drive South Jordan, Utah 84095 (801) 576-0250

Erickson, Incorporated 503 West 400 South Salt Lake City, Utah 84101 (801) 359-6861 Evergreen Environmental Services 6880 Smith Avenue Newark, California 94560 (1-800) 972-5284 (510) 791-0126 FAX

First Recovery 200 Petro Avenue, Site B Sioux Falls, South Dakota 57117 (1-800) 545-3520 Floyds of South Carolina, Incorporated Post Office Box 12318 Florence, South Carolina 29504 (803) 669-0192

Franks Vacuum Truck Service 4500 Royal Avenue Niagara Falls, New York 14303 (716) 284-2132 Fred Cheney 7680 Goldstein Lane Bozeman, Montana 59715 (406) 586-5067 (406) 580-5067 FAX

Freehold Cartage, Incorporated Post Office Box 5010 Freehold, New Jersey 07728-5010 (908) 462-1001 Golden Eagle Refinery, Incorporated 1474 West 1500 South Woods Cross, Utah 84087 (801) 298-8882

H&M Oil Corporation Post Office Box 215 Pocatello, Idaho 83201-0215 Indian Oil 4891 West 11000 North Highland, Utah 84003 (801) 785-8522

LePier Oil Company, Incorporated 320 East First Street Fosston, Minnesota 56542 (218) 435-1040 Loes Post Office Box 156 Mankoto, Minnesota 56001 (507) 625-5278

Lund Oil, Incorporated Post Office Box 38 Keene, North Dakota 58847 (701) 675-2264 Mesa Oil 14701 Broadway, SE Albuquerque, New Mexico 87105 (1-800) 873-3645

Moore Oil, Incorporated Post Office Box 564 Libby, Montana 59923 (406) 827-4314 National Tank and Monitoring, Incorporated 3856 West 5400 South Salt Lake City, Utah 84118 (801) 967-2233

Northern Plains Transport Rural Route 1, Box 350 Bismarck, North Dakota 58501 (701) 258-5203 OSI Environmental, Incorporated 104 South 15th Avenue Virginia, Minnesota 55792 (218) 749-3060

Oil Enterprises, Incorporated Post Office box 278 Midvale, Utah 84047 (801) 255-5845 Oily Waste Processors Post Office Box 2903 Great Falls, Montana 59403 (406) 761-4503

Ozzies Drain Company Post Office Box 9289 Missoula, Montana 59807 (406) 543-7911 Petroleum Processors, Incorporated Post Office Box 1016 American Fork, Utah 84003 (801) 785-0106

R-Three, Incorporated 1046 Johnson Lane Billings, Montana 59102 (406) 323-3615 Thermo Fluids, Incorporated Post Office Box 1970 Gilbert, Arizona 85299 (1-800) 350-7565

Tri-State Oil Reclaimers Post Office Box 735 Newcastle, Wyoming 82701 (1-800) 876-8645

Environmental	Recource	Manual	ı
ranvironmentat	DESOURCE	uviannai	

IV. Environmental Management Issues

1.	What are Hazardous Wastes?
2 .	Toxicity Characteristic Leaching Procedure44
3.	Hazardous Waste Generators Rules
4.	Obtaining a U.S. Environmental Protection Agency
	Identification Number47
5 .	Hazardous Waste Accumulation and Storage Limits51
6.	Shipping Hazardous Waste Off Site54
7.	Container Labeling and Other Forms of Warning59
8.	EPA Hazardous Waste Numbers (Codes)60
9.	Polychlorinated Biphenyls (PCBs)66
10.	Potential Problem Products
11.	Material Safety Data Sheets
12 .	Chemical Hazard Communication Program
13.	Health Hazards80
14.	Preparing for and Preventing Accidents82
15 .	Planning for Emergencies83
16.	Sample Environmental Management Policy Statements84
17 .	Aerosol Spray Cans: An Alternative

1. What are Hazardous Wastes?

In 1976, Congress passed the Resource Conservation and Recovery Act (RCRA) which directed the U.S. Environmental Protection Agency (EPA) to develop and implement a program to protect human health and the environment from improper hazardous waste management practices. The program is designed to control the management of hazardous waste from its generation to its ultimate disposal – from "cradle-to-grave."

EPA first focused on large companies, which generate the greatest portion of hazardous waste. Business establishments producing less than 1,000 kilograms (2,200 pounds) of hazardous waste in a calendar month (known as small quantity generators) were exempted from most of the hazardous waste management regulations published by EPA in May of 1980.

In subsequent years, public attention focused on the potential for environmental and health problems that may result from mismanaging even small quantities of hazardous waste. For example, small amounts of hazardous waste dumped on the land may seep into the earth and contaminate underground water that supplies drinking water wells.

In November of 1984, the Hazardous and Solid Waste Amendments to RCRA were signed into law. With these amendments, Congress directed EPA to establish new requirements that would bring small quantity generators who generate between 100 and 1,000 kilograms of hazardous waste in a calendar month into the hazardous waste regulatory system. EPA issued final regulations for these 100 to 1,000 kilograms per month generators on March 24, 1986. Most of the requirements were effective September 22, 1986.

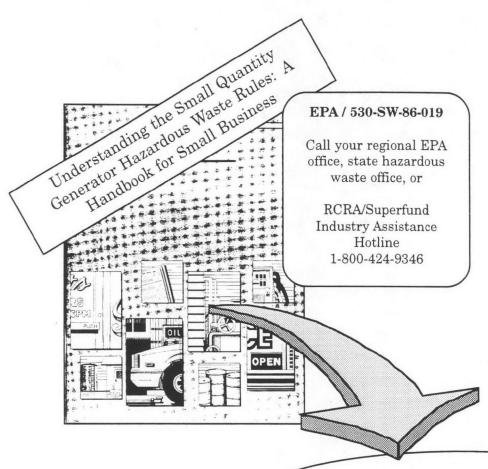
More recently, on May 11, 1995, the EPA put the *Universal Waste Rule* into effect. This designates certain wastes shippable without manifests. It is designed to help recycling efforts. Some States have adopted and expanded on this Rule. Parks should check with their State for the local application of the Universal Waste Rule. EPA Region VIII can provide answers in this area through their RCRA Program: (303) 312-6045 or (303) 312-6525.

What is a Hazardous Waste?

A waste is any solid, liquid, or contained gaseous material that you no longer use, and either recycle, throw away, or store until you have enough to treat or dispose.

As a result of operations, a park may generate wastes that can cause serious problems if not handled and disposed of carefully. Such wastes could cause injury or death, or damage or pollute land, air, or water. These wastes are considered hazardous, and they are currently regulated by federal and state public health and environmental safety laws.

There are two ways a waste may be brought into the hazardous waste regulatory system: listing, and identification through characteristics.



This document has great information on how to determine if your waste is hazardous, what you should do, and how to do it.

Contact your regional EPA office or the designated state office for additional information on obtaining this document.

(see contact section of this resource manual)



For a list of vehicle maintenance products that may contain hazardous materials, see page 69!

Listed wastes: Your waste is considered hazardous if it appears on any one of the four lists of hazardous wastes contained in the RCRA regulations. These wastes have been listed because they either exhibit one of the characteristics described below or contain any number of toxic constituents that have been shown to be harmful to health and the environment. The regulations list over 400 hazardous wastes, including wastes derived from manufacturing processes and discarded commercial chemical products.

Characteristic wastes: Even if a waste does not appear on one of the EPA lists, it is considered hazardous if it has one or more of the following characteristics:

- It is easily combustible or flammable; this is called ignitable waste. If your waste has a flashpoint of 140°F or lower, it is defined as an ignitable hazardous waste. Examples are paint wastes, certain degreasers, and many solvents.
- It dissolves metals, other materials, or burns the skin. This is called a *corrosive* waste. If your waste has a pH of less than or equal to 2.0, or greater than or equal to 12.5, your waste is a corrosive hazardous waste. Examples are waste rust removers, waste acid or alkaline cleaning fluids, and waste battery acid.
- It is unstable or undergoes rapid or violent chemical reaction with water or other materials. This is called *reactive* waste. Examples are cyanide plating wastes, waste bleaches, and other waste oxidizers.
- A waste sample is tested and shows EP (extraction procedure) toxicity. Wastes are *EP toxic* if an extract from the waste is tested and found to contain high concentrations of heavy metals (such as mercury, cadmium, or lead) or specific pesticides that could be released into the ground water.

You may generate other wastes beyond the examples mentioned above. It is your responsibility to determine whether your wastes are hazardous. If you need assistance, call one of the following sources in information:

- Your state hazardous waste management agency.
- Your EPA regional office.
- The RCRA/Superfund Hotline: 1-800-424-9346.
- EPA's Small Business Ombudsman Hotline: 1-800-368-5888

Categories of Hazardous Waste Generators

Since the 1986 amendments, there have been three categories of hazardous waste generators:

- The Conditionally Exempt Small Quantity Generator (CESQG) who generates no more than 100 kilograms (220 pounds) of hazardous waste per month;
- The **Small Quantity Generator** (SQG) who generates 100 to 1,000 kilograms (220 to 2,200 pounds) of hazardous waste per month; and
- The Large Quantity Generator (LQG) who generates 1,000 kilograms (2,200 pounds) or more hazardous waste per month.

To determine which category of hazardous waste generator you fall into, and which requirements you must meet, you must measure, or "count" the hazardous waste you generate in a calendar month. In general, you must add up the weight of all hazardous wastes you generated in that month, and the total weight will determine your category. Remember, you are the one responsible for determining which of your wastes are hazardous, and for keeping records to know your generator size. If you use a laboratory analysis to determine if a waste is hazardous, keep the laboratory analysis report as a part of your environmental records.

Acutely Hazardous Wastes

Some wastes are considered to be acutely hazardous. These are wastes that EPA has determined to be so dangerous in small amounts that they are regulated the same way as are large amounts of other hazardous wastes. Acutely hazardous wastes, for example, may be generated when using certain pesticides. They also include dioxin-containing wastes.

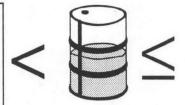
If you generate more than 1 kilogram (2.2 pounds) of acutely hazardous wastes in a calendar month or store more than that amount for any period of time, you are subject to all the regulations that apply to generators that generate more than 1,000 kilograms of hazardous waste per calendar month (Large Quantity Generator).

1 kilogram = 2.2 pounds 100 kilograms = 220 pounds 1,000 kilograms = 2,200 pounds

55-gallon drum approximately 200 kilograms 55-gallon drum approximately 440 pounds

Conditionally Exempt Small Quantity Generator

Less than 100 kilograms (220 pounds), one-half 55-gallon drum (approximately) per calendar month, or 1 kilogram (2.2 pounds) or more per month of acutely hazardous waste



You must determine if your waste is hazardous, and if it is, you are responsible for it for 30 years, regardless of what you do with it!

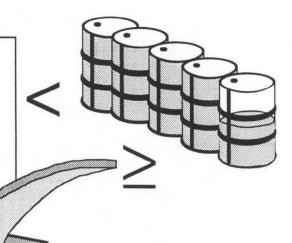
Your Waste is Hazardous if...

...it is characteristic - demonstrates specific characteristics

...it is a *listed waste* - one of over 400 wastes listed by EPA

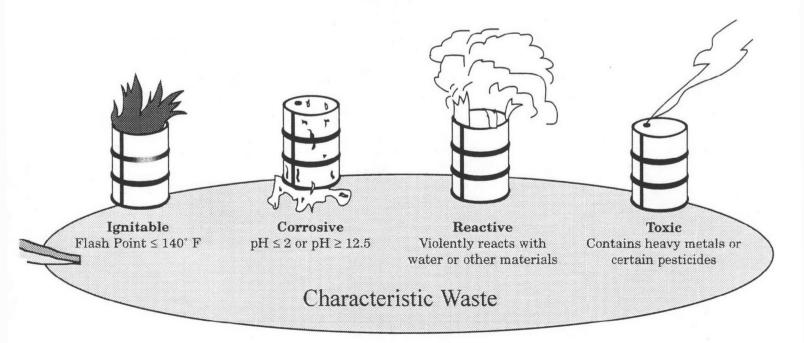


More than 100 kilograms (220 pounds), but less than 1,000 kilograms (2,200 pounds), four and one-half 55-gallon drums (approximately) per calendar month, or 1 kilogram (2.2 pounds) or more per month of acutely hazardous waste



Large Quantity Generator

1,000 kilograms (2,200 pounds) or more, four and one-half 55-gallon drums (approximately) per calendar month, or 1 kilogram (2.2 pounds) or more per month of acutely hazardous waste



2. Toxicity Characteristic Leaching Procedure

On March 29, 1990, the U.S. Environmental Protection Agency (EPA) promulgated a rule to revise the existing toxicity characteristics which are used to identify those wastes which are hazardous and thus subject to regulation under Subtitle C of the Resource Conservation and Recovery Act (RCRA). This rule added 25 constituents to the list of eight metals, four pesticides, and two herbicides already regulated under Subtitle C of RCRA (see included table for complete list of constituents). The rule also replaced the Extraction Procedure (EP) Toxicity Characteristic with a more comprehensive testing procedure known as the Toxicity Characteristic Leaching Procedure (TCLP) or Method 1311 (55 FR 11798) as mandated in the Hazardous and Solid Waste Amendments of 1984 (HSWA). The TCLP is used to measure the mobility of both organic and inorganic contaminants and the allowed maximum concentrations in milligrams per liter (mg/L).

TCLP and Extraction Procedure (EP)

The major differences between the EP procedure and the TCLP procedure include:

- TCLP uses an extraction fluid based on the alkalinity of the sample.
- A "Zero-Headspace Extractor" is required for the extraction of volatile organic compounds from the sample under the TCLP procedure.
- The extraction time for the TCLP procedure is only 18 hours instead of 24 hours for the EP procedure.
- TCLP has a stricter quality assurance requirement.

The TCLP rule is in effect for large quantity generators [1,000 kilograms (2,200 pounds) or more per month] and took effect March 29, 1991 for small quantity generators [more than 100 kilograms but less than 1,000 kilograms (2,200 pounds) per month]. Generators are advised that waste that did not exhibit the EP toxicity characteristics may be categorized as hazardous under TCLP.

The latest version of the TCLP procedure can be found in the Federal Register, Vol. 55, pages 26986-2698, dated June 29, 1990.

TCLP Constituents and Levels					
<u>Contaminant</u>	Level (mg/l)	<u>Contaminant</u>	Level (mg/l)		
Arsenic (7440-38-2)	5.0	Hexachlorobenzene (118-74-1)	0.13		
Barium (7440-39-3)	100.0	Hexachlorobutadiene (87-68-3)	0.5		
Benzene (71-43-2)	0.5	Hexachloroethane (67-72-1)	3.0		
Cadmium (7440-43-9)	1.0	Lead (7439-92-1)	5.0		
Carbon tetrachloride (56-23-5)	0.5	Lindane (58-89-9)	0.4		
Chlordane (57-74-9)	0.03	Mercury (7439-97-6)	0.2		
Chlorobenzene (108-90-7)	100.0	Methoxychlor (72-43-5)	10.0		
Chloroform (67-66-3)	6.0	Methyl ethyl ketone (78-93-3)	200.0		
Chromium (7440-47-3)	5.0	Nitrobenzene (98-95-3)	2.0		
o-Cresol (95-48-7)	200.0	Pentachlorophenol (87-86-5)	100.0		
m-Cresol (108-39-4)	200.0	Pyridine (110-86-1)	5.0		
p-Cresol (106-44-5)	200.0	Selenium (7782-49-2)	1.0		
Cresol (1319-77-3)	200.0	Silver (7440-22-4)	5.0		
2,4-D (94-75-7)	10.0	Tetrachloroethylene (127-18-4)	0.7		
1,4-Dichlorobenzene (106-46-7)	<i>7</i> .5	Toxaphene (8001-35-2)	0.5		
1,2-Dichloroethane (107-06-2)	0.5	Trichloroethylene (79-01-6)	0.5		
1,1-Dichloroethylene (75-35-4)	0.7	2,4,5-Trichlorophenol (95-95-4)	400.0		
2,4-Dinitrotoluene (121-14-2)	0.13	2,4,6-Trichlorophenol (88-06-2)	2.0		
Endrin (72-20-8)	0.02	2,4,5-TP (Silvex) (32534-95-5)	1.0		
Heptachlor (76-44-8)	0.008	Vinyl chloride (75-01-4)	0.2		

3. Hazardous Waste Generator Rules

If you generate more than 100 kilograms (about 25 gallons or 220 pounds) in a month of hazardous wastes, you are required by law to comply with certain activities. These include:

- Identify and determine the volume of all hazardous waste that your facility generates.
- Determine if you generate more than 100 kilograms (220 pounds) of hazardous waste (total per any calender month).
- Obtain a U.S. Environmental Protection Agency Identification Number (see the next section for how to apply, etc.).
- Store hazardous wastes in approved, safe, sealed storage containers, usually 55-gallon drums. Contact your Field Area Office for more information.
- Each container must be properly labeled and closed. Contact your Field Area Office for more information.
- All hazardous waste containers must be stored in a secure location, and you must conduct visual periodic inspections for leaks, usually weekly.
- All employees must be familiar with handling and emergency procedures.
- You can only store hazardous waste for a specified time before you must have it removed for treatment or disposal.
- You are responsible for all hazardous waste from the time it is generated until it is disposed of (cradle-to-grave), even though you may turn it over to a transporter and/or disposal facility.
- EPA requires that all hazardous waste transporters and disposal facilities have an EPA Identification Number. Be sure to check for this before you turn your waste over to your service provider. Keep a copy in your files.
- Because of the complexities of hazardous waste treatment, you may not treat, transport, or dispose of your own hazardous wastes without a corresponding U.S. Environmental Protection Agency permit.
- Prepare and submit all required U.S. Environmental Protection Agency and state hazardous waste management agency reports in a timely fashion.

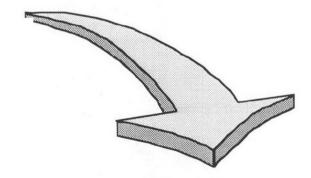
4. Obtaining a U.S. Environmental Protection Agency Identification Number

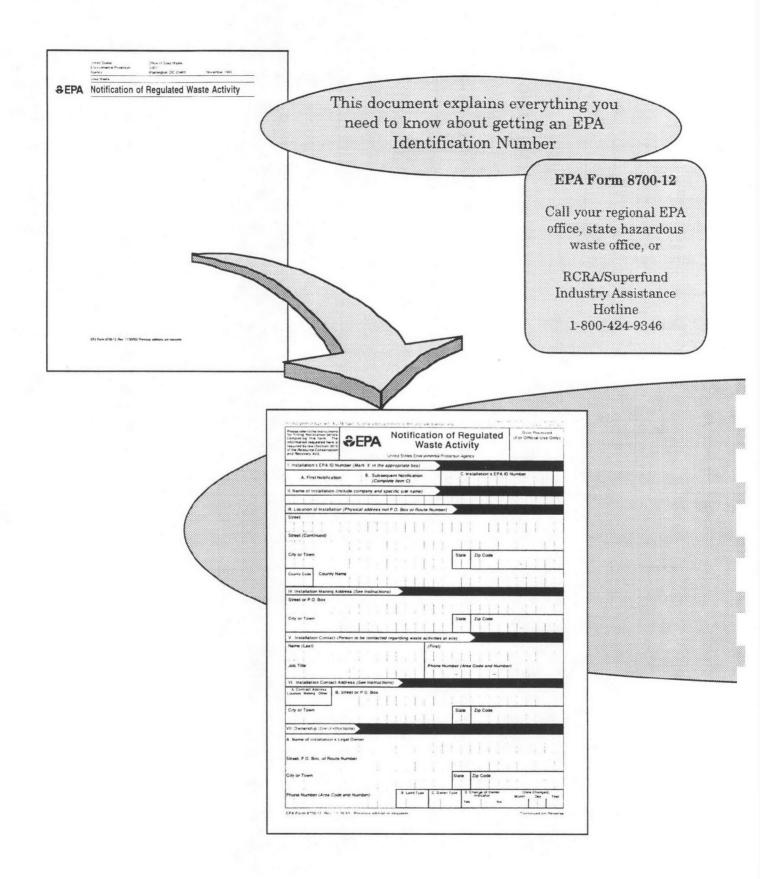
If you generate more than 100 kilograms (220 pounds) of hazardous waste in any one calendar month, your are either a Small Quantity Generator (SQG) or a Large Quantity Generator (LQG), and must obtain a U.S. EPA Identification Number for each site or location where hazardous wastes are generated. Transporters and facilities that store, treat, or dispose of regulated quantities of hazardous waste must also have a U.S. EPA Identification Number is a twelve-character number that uniquely identifies your facility and will be used as part of a national database on hazardous waste activities.

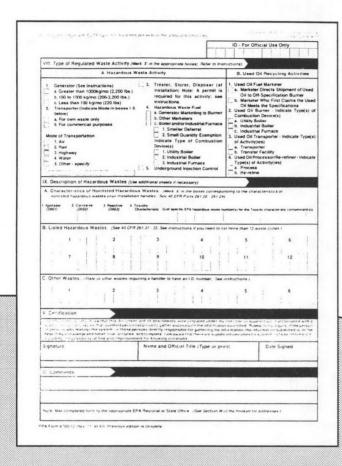
To obtain a U.S. EPA Identification Number, you can:

- Call or write to your state hazardous waste management agency or regional EPA office and ask for a copy of EPA Form 8700-12, "Notification of Hazardous Waste Activity." You will be sent the form and a booklet with instructions for filling it out.
- Complete the form, keep copies for your environmental records, and submit the completed form to the designated regulatory office.

(See graphic on next page)





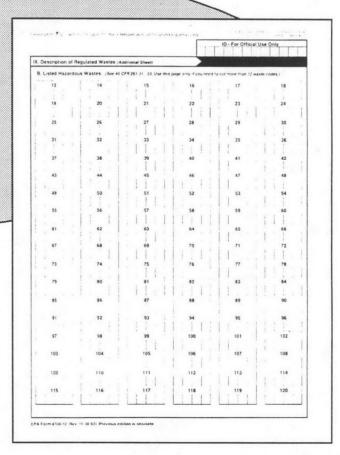


Notification of Regulated Waste Activity

EPA Form 8700-12

Contact your regional EPA office or the designated state office for additional information on obtaining the Environmental Protection Agency Identification Number

(see contact section of this resource manual)





Do not accumulate more than 1,000 kilograms (2,200 pounds)

or you must be reclassified as a SQG!

SQG?

Do not accumulate more than 6,000 kilograms (13,200 pounds)

in any 180 day period

or

270 days if your waste must be transported over 200 miles for disposal,

or you must obtain a special permit!

LQG?

5. Hazardous Waste Accumulation and Storage Limits

There are storage limits for hazardous wastes for Conditionally Exempt Small Quantity Generators (CESQG), Small Quantity Generators (SQG), and Large Quantity Generators (LQG). If you decide to accumulate hazardous waste until you have collected enough to make transport to a licensed hazardous waste management facility more economical, make sure that:

- If you are a CESQG, you cannot accumulate more than 1,000 kilograms (2,200 pounds) of hazardous waste at any time or you will be subject to the same requirements as a SQG.
- If you are a SQG or LQG, you can accumulate no more than 6,000 kilograms (13,200 pounds) of hazardous waste in any 180 day period (or 270 days if your waste must be transported over 200 miles to a licensed hazardous waste facility). Otherwise, you will need a special storage permit from EPA.

You can store hazardous waste in 55-gallon drums, tanks, or other containers suitable for the type of waste generated if you follow certain common sense rules that are meant to protect human health and the environment, and reduce the likelihood of damages or injuries caused by leaks or spills of hazardous wastes. If you store your hazardous waste in containers, you must:

- Clearly mark each container with the words "HAZARDOUS WASTE," and the date you began to collect waste in that container.
- Keep all containers in good condition, handle them carefully, and replace any leaking ones. Be sure to store all containers indoors and not exposed to the elements.
- Do not store hazardous waste in a container that may rupture, leak, corrode, or otherwise fail.
- Keep all containers closed except when filling them.
- Inspect all containers with hazardous waste for leaks or corrosion every week.
- For safety reasons, make sure that if you are storing ignitable or reactive wastes, the containers are placed as far as possible from your facility property line to create a buffer zone.
- Never store wastes in the same container that could react together to cause fires, leaks, or other releases.

- As a general safety rule, do not stack drums.
- Make sure that the stored waste is taken off-site or treated on-site within 180 (or 270) days.
- Do not mix nonhazardous wastes with hazardous wastes. For example, do not put nonhazardous cleaning agents or rags in the same container as a hazardous solvent or the entire contents becomes subject to the hazardous regulations.
- Avoid mixing several different hazardous wastes. Doing so may make recycling very difficult, if not impossible, or make disposal more expensive.
- Make sure the original containers of hazardous products are completely empty before you throw them away. Use all the product.
- Avoid using more of a hazardous product than you need. For example, use no more degreasing solvent or pesticide than you need to do the job, and certainly consider nonhazardous alternatives before you buy hazardous materials. Also, do not throw away a container with unused solvent or pesticide in it.
- Consider secondary containment systems as a precaution against an accidental leak or spill. If leakages or spills do occur, immediately clean them up in accordance with your park plan.

If you store your hazardous wastes in tanks, you must follow similar common sense rules:

- Do not store hazardous waste in a tank if it may cause rupture, leaks, corrosion, or otherwise cause the tank to fail.
- Keep a tank covered or provide at least two feet of freeboard (space at the top of the tank) in uncovered tanks.
- If your tanks have equipment that allow the waste to flow into them continuously, provide waste feed cutoff or bypass systems to stop the flow in case of problems.
- Inspect any monitoring or gauging systems on each operating day and inspect the tanks themselves for leaks or corrosion every week.
- Use the National Fire Protection Association's (NFPA) buffer zone requirements for tanks containing ignitable or reactive wastes. These requirements specify distances considered as safe buffer zones for various liquids based on the characteristics of all combustible and flammable liquids.

	•	D 1	\sim	
Nationa	al	Park	-56	שמועדוני

The storage requirements and container specifications for hazardous wastes under the Resource Conservation and Recovery Act are very similar to the requirements outlined by the Occupational Safety and Health Administration. Complying with one will usually ensure compliance with the other. However, if you have any questions, please contact your state hazardous waste regulatory office, your EPA regional office, or your NPS Area Office Environmental Coordinator.

6. Shipping Hazardous Waste Off-Site

Carefully choosing a hauler and designating a waste management facility is vitally important. The hauler will be handling your wastes beyond your control while you are still responsible for their proper management. Similarly, the waste management facility will be the final destination of your hazardous waste for treatment, storage, or disposal. Before choosing a hauler or designating a disposal facility, check with the following sources:

- Your professional colleagues and other parks who may have used a specific hazardous waste hauler or designated facility in the past.
- Your Better Business Bureau or Chamber of Commerce to find out if any complaints have been registered against a hauler or facility.
- Your state hazardous waste management agency or your regional U.S. Environmental Protection Agency (EPA) office, which will be able to tell you whether or not a company has a U.S. Environmental Protection Agency Identification Number, and may know whether or not the company has had any problems. Also contact your Field Area Office for more assistance.

After checking these sources, contact the hauler and designated hazardous waste management facility directly to verify that they have U.S. Environmental Protection Agency Identification Numbers, and that they can and will handle your waste. Also make sure that they have the necessary permits and insurance, and that the hauler's vehicles are in good condition. Checking sources and choosing a hauler and designated facility may take some time – try to begin checking well ahead of the time you will need to ship your waste. Careful selection is very important. Remember, you are responsible for your hazardous wastes from "cradle-to-grave," even after you turn it over to the hauler, and even after it has been disposed.

Preparing Your Wastes for Shipment

When you prepare hazardous wastes for shipment, you must put the wastes in containers that are acceptable for transportation and make sure the containers are properly labeled. Reusing product containers may be possible if they meet the DOT requirements; contact your Field Area Office if you have any questions. Your hauler should be able to assist you as you might need. If you need additional information, you may wish to consult the requirements for packaging and labeling hazardous wastes found in the Department of Transportation (DOT) regulations (49 CFR 172). To find out what these requirements are for your wastes, you should contact your state hazardous waste management agency for the name and telephone number of your state transportation agency. Your state transportation agency, your hauler, or your designated facility can help you understand the DOT requirements.

The Uniform Hazardous Waste Manifest

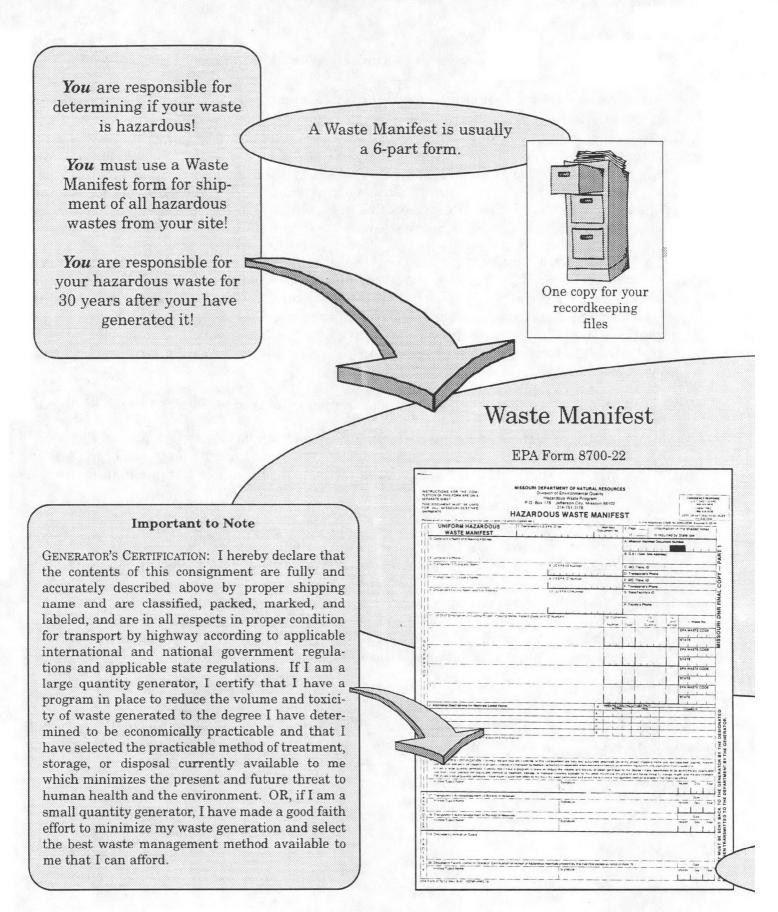
A hazardous waste manifest is a multicopy shipping document that you must fill out and use to accompany your hazardous waste shipments. The manifest form is designed so that shipments of hazardous waste can be tracked from their point of generation to their final destination – the so-called "cradle-to-grave" system. The hazardous waste generator, the hauler, and the designated facility must each sign this document and keep a copy. The designated facility operator also must send a copy back to you, so that you can be sure that your shipment arrived. You must keep this copy, which will be signed by the hauler and designated facility, on file for three years.

If you do not receive a signed copy from the designated hazardous waste management facility within 30 days, it is a good idea for you to find out why, and if necessary, let the state or EPA know. Remember: Just because you have shipped the hazardous waste off your site and it is no longer in your possession, your liability has not ended. You are potentially liable under Superfund for any mismanagement of your hazardous waste. The manifest will help you track your waste during shipment and make sure it arrives at the proper destination.

You can obtain blank copies of the manifest from several sources such as the following:

- If the state to which you are shipping your waste has its own manifest, use that manifest form. Contact the hazardous waste management agency of that state, your hauler, or the designated facility you intend to use for manifest forms.
- If the state to which you are shipping your waste does not have its own manifest, use the manifest of the state in which your waste was generated. Contact your hauler or your state hazardous waste agency for blank forms.
- If neither state requires a state-specific manifest, you may use the general "Uniform Hazardous Waste Manifest" EPA Form 8700-22. Copies are available from some haulers and designated hazardous waste management facilities, or may be purchased from some commercial printers.

States, haulers, recyclers, and designated facilities may require additional information; check with them before you prepare a hazardous waste shipment. Your hazardous waste hauler often will be the best source for packaging and shipping information and will help in completing the manifest. EPA has also prepared some industry-specific information to help you in completing the manifest which is available through your regional EPA office.



I.D.	Marie Tolk			
rdous Waste Manifest No.		_	EPA Hazardous Waste N	PER SECURIOR SE
cordance with the Hazardous an high restricts the land disposal eithed and level our waste(s) in This material is intended to be	of hazardous wastes, nust be treated to com	we are not	tifying by marking the appro-	Conservation and Re
Hezardous Waste Description	Conetituents of Co	pnoem	Omposition, mg/kg	Westerreter Total Composition, mg/L
F001 - Spent hatogenested seavents used in degreesing	Carbon tetrschloride Meltrytene chloride Tetrschloriseltylene 1,1,1-Trichlorioethane Trichlorioethylene 1,1,2-Trichlorie-1,2,2- tfl.orioethane	000000	5.8 20 5.8 5.8 5.8 20	0.057 0.089 0.066 0.054 0.054 0.057
7	Trichiorofuoromethene Chlorobenzene	0	33	0.0g 0.067
F002 - Spent halogenated solvents	1.2-Olohlorobenzene 1.2-Olohlorobenzene Methylene chloride Methylene shloride (from the phermaceutica Tetrachloroethylene	00000	5.7 6.2 33 -	0.067 0.068 0.088 0.44
	1,1,1-Trichionosthans 1,1,2-Trichionosthans Trichionosthylans 1,1,2-Trichion-1,2,3- trifucrosthans Trichionosthans Trichionosthans	0 00000	5.0 5.0 7.0 5.0 26	0.066 0.054 0.030 0.064 0.067
F003 - Spent non-hatogenalised solvents	Acetone n-Butyl sloonol Cyclohesenone Ethyl acetale Ethyl solate Ethyl sharte Ethyl shart Methanol Methyl laobutyl ketone Xylenee (total)	000000000	160 2.8 0.73 33 6.0 160 0.73 33 28	0.26 5.6 0.36 0.34 0.067 0.12 5.6 0.14
F004 - Spent non-halogenated solvents	Creasi (m and p isomers) o-Creasi Nitrobenzene	000	3.2 5.6 14	0.77 0.11 0.086
Pool - Spent non-histogenuted solvents	Benzane Carbon deutlide 2-Ethospethanol laobutanol Methyl ethyl setons 2-Hitropropane	000000	2.7 4.8 ¹ PNON 170 26 INON	0.070 0.014 8ICOG: or INCIN 5.8 0.28 (WETCX or CHOXD) to CARBH; or
4000	Pyridine Toluene	00	1	INCIN 0.014 0.08

Land Disposal Restrictions Notification Form

A completed Land Disposal Restrictions Notification is usually required with your shipment of hazardous waste.

Everyone needs an EPA Identification Number!

You typically must send a completed Waste Manifest copy (returned from the disposal facility) to your state hazardous materials agency after it has been disposed.

If you do not receive a copy from the disposal facility within 35 days, notify your state.

I CERTIFY that this waste does not contain 2-ethoxyethanol or 2-nitropropane (check box if applicable). Analysis is attached (check box if applicable). ERTIFY that the information submitted herein and all accompanying information is true and accurate, thortzed aigneture: Int or Type Name: Ide: Integral is providing this sample Land Disposel Respiction horizone horn as a sourteey to our autioners. Heritage does not warrant the use the contemporary of the sample formation or the providing this sample to the contemporary of the sample formation notification is responsible to this document. Each person who makes a Land Disposel Respiction notification is responsible to the related to use of this document. Each person who makes a Land Disposel Respiction notification is responsible to the related to use of this document. Each person who makes a Land Disposel Respiction notification is responsible to use the sample form, please review it corestably to ensure it complete insurances for your operation weater(s).							
DOOT x 10% TOC Non-WW NA - Tech Based FSUBS This shipment includes additional wester identified below: CFR Reference Treatment Code Subcategory Treatability Treatment Treatment Code Applicable Mazardous Waste No. Subcategory Treatability Treatment Standards Applicable I CERTIFY that this waste does not contain 2-sthouyethanol or 2-nitropropane (check box if applicable). Analysis is attached (check box if applicable). PERTIFY that the information submitted herein and all accompanying information is true and accurate. thortred signeture: Int or Type Name: Int or Type Name: Int I Type Name: Int I Type		Subcategory	Treatability Group	CFR Ref.	Std.	Elve Lette	er Code
This shipment includes additional wester identified below: CFR Reference Treatment Code Treatment Standards CFR Reference Treatment Code Treatment Standards Applicable I CERTIFY that this wester does not contain 2-ethoxyethanol or 2-nitropropane (check box if applicable). Analysis is attached (check box if applicable). CERTIFY that the information submitted herein and all accompanying information is true and accurate. Lithorized signature: Lithori	Кове	NA	WW/Non-WW	258,41, 2	68.43	NA - Cor	c. Based Std.
Hazardous Waste No. Subcategory Treatability Treatment Treatment Applicable I CERTIFY that this weste does not contain 2-ethoxyethanol or 2-nitropropane (check box if applicable). Analysis is stached (check box if applicable). CERTIFY that the information submitted herein and all accompanying information is true and accurate. Light or Type Name: The: It is the information of the providing this semple Lund Cirpose Residon hoofcodon form as a sourisely to our outdomers. Hereings did not not providing this semple Lund Cirpose Residon hoofcodon form as a sourisely to our outdomers. Hereings did not consume on years of the consumers that is not selected outdomers. Hereings did not not providing the semple Lund Cirpose Residon hoofcodon form as a sourisely to our outdomers. Hereings did not consume on years outdomers. Hereings did not seam on years providing or facility, and appressing disciplinary and providing the providing the semple Lund Cirpose Residon for the residual to use of this document. Each person who makes a Lund Cirposel Residon forcidation is responsible to fall to complete with a fulfill applicable line. If you choose to use this sample turn, please review it corestly to ensure it complete in the consumer of year specifies waste(id).	D001	≥10% TOC	Non-WW	NA - Tech	Based	FSUBS	
Hazardous Waste No. Subcategory Treatability Treatment Treatment Cod Applicable Standards Applicable I CERTIFY that this waste does not contain 2-ethoxysthanol or 2-nitropropane (check box if applicable).	This shipme	ent includes addition	nal wastes identified i	below:			
Analysis is attached (check box if applicable). CERTIFY that the information submitted herein and all accompanying information is true and accurate. Lighthorized signeture: Print or Type Name: Title: Itel:	Hazardous Wast	a No. Su	bcategory		Treatmen	nt	Treatment Code as
Analysis is attached (check box if applicable). CERTIFY that the information submitted herein and all accompanying information is true and accurate. Uthorized signature: Interpolation of Type Name: Ide: Id	1,000			WIND TO SERVE			
Analysis is attached (check box if applicable). CERTIFY that the information submitted herein and all accompanying information is true and accurate, withorized signature: withorized signature: Itie: It						_	
Analysis is attached (check box if applicable). CERTIFY that the information submitted herein and all accompanying information is true and accurate. uthorized signature: into or Type Name: Ide: lette: lette	- 100		1. (100)		ich.		
Analysis is attached (check box if applicable). CERTIFY that the information submitted herein and all accompanying information is true and accurate. Lighthorized signeture: Print or Type Name: Title: Itel:		-	80 0			11 167	387
withortzed signature: Title: Little:	_			ethanol or 2-nitro	opropene (check box i	applicable).
Title: Set: Set:	CERTIFY that the	information submit	ed herein and all acc	companying infor	metion is t	rue and acc	curate.
Ide: **Rite:** **Rit	uthorized signatu	re:				P. F.	
inflage is providing this sample Land Clipocel Restriction Hotilication form as a courteey to our customers. Heritage does not warrant the solid file both in EPA of for any specific purpose, waste or in-real-most method and does not warrant that is use will conside so consideration of the solid post	rint or Type Name						
entage is providing this sample. Land Disposed Restriction hostication from as a southern to our customers. Heritage does not weren't the southern to EPA or for any spoods purpose, waste or restricted needed and does not werrant that its use set the since of the southern companies with its restriction of the southern companies and the southern companies of the southern companies of the southern companies of the southern companies of the majority or the southern companies with and Littles applicable last. If you choose to use this sample, form, please review it carefully to ensure it complete output appeals washing.	tie:				200		
(Fith form to EPA or for any specially purpose, waste or treatment method and dose not warrant that its use will contribute compliance with in. Heritage will not assume any responsibility or faulthing assured preclaims responsibility for things, carriage, carriage and refer to the form that the superior section may rate out of or be instead to use of this document. Each person who makes it and Disposal Restriction notification is responsible for all its completies when of Littles applicable last. If you choose to use this sample form, please review it cerefully to ensure it complete experiments for your specific research(s).	ute:		-		5	1.0	
	If this form to EPA or k ew. Heritage will not a thich many arise out of that it complies with a	for any specific purpose, sesume any responsibility or be related to use of the and fulfills applicable is	waste or treatment method y or liability, and express a document. Each person	od and does not war y disclaims respons I who makes a Land	rant that its u folloy or liabili Disposal Res	ise will consist by, for any per triction notifica	ute compliance with application, damages or other of allon is responsible for ens.

Federal regulations allow you to haul your hazardous waste to a designated facility yourself. You must, however, obtain an EPA transporter identification number and comply with applicable DOT requirements for packaging, labeling, marking, and placarding your shipment. There are also financial responsibility and liability requirements under the Federal Motor Carrier Act, but you may be exempt from these if you:

- Use a vehicle with a Gross Vehicle Weight Rating of less than 10,000 pounds (van or pickup).
- Transport your wastes for commerce within your state in non-bulk shipments (e.g., containers with capacities of less than 3,500 gallons).
- Transport hazardous wastes which meet the "limited quantity exclusion" requirements of §172.101 of the DOT regulations.

7. Container Labeling and Other Forms of Warning

Each container of hazardous waste must be properly marked and labeled in accordance with Department of Transportation (DOT) regulations (49 CFR 172, Subpart D-E). These regulations require:

- Proper DOT shipping name on each waste drum.
- Proper DOT identification number on each waste drum.
- Proper U.S. Environmental Protection Agency waste number (code) on each waste drum. (See this section of the Resource Manual.)
- Generator's U.S. Environmental Protection Agency (EPA) Identification Number, name, and address on each drum. (See this section of the Resource Manual.)
- Properly labeled for ignitable, reactive, corrosive, or toxic waste.
- Each container must include the date when it becomes full.
- Each container must be labeled with the words "HAZARDOUS WASTE."
- Waste containers must show identification of their waste contents, not the original product if reusing containers.

8. EPA Hazardous Waste Numbers (Codes)

The Environmental Protection Agency has established a range of special codes that generally identify solid hazardous wastes. These codes are used in conjunction with EPA Form 8700-12 "Notification of Hazardous Waste Activity," and EPA Form 8700-22, "Uniform Hazardous Waste Manifest" (or equivalent). (See previous sections of this Resource Manual.)

Solvents

Solvents, spent solvents, solvent mixtures, or solvent still bottoms are often hazardous. This includes solvents used in degreasing (identified as F001) and paint brush cleaning and distillation residues from reclamation. The following are some commonly used hazardous solvents (also see ignitability wastes for other hazardous solvents, and 40 CFR 561.31 for most listed hazardous waste solvents):

Benzene	F005
Carbon Disulfide	F005
Carbon Tetrachloride	F001
Chlorobenzene	F002
Cresols	F004
Cresylic Acid	F004
O-Dichlorobenzene	F002
Ethanol	D001
2-Ethoxyethanol	F005
Ethylene Dichloride	D001
Isobutanol	F005
Isopropanol	D001
Kerosene	D001
Methyl Ethyl Ketone	F005
Methylene Chloride	F001, F002
Naphtha	D001
Nitrobenzene	F004
2-Nitropropane	F005
Petroleum Solvents	D001
(Flashpoints <140°F)	
Pyridine	F005
1,1,1-Trienleroethane	F001, F002
1,1,2-Trichloroethane	F002
Tetrachloroethylene	F001, F002
Toluene	F005
Trichloroethylene	F001, F002
Trichlorofluoromethane	F002

Trichlorotrifluoroethane White Spirits

F002 D001

Acids and Bases

Acids, bases, or mixtures having a pH less than or equal to 2, or greater than or equal to 12.5, are considered corrosive. All corrosive materials and solvents have the EPA Hazardous Waste Number D002. The following are some of the more commonly used corrosives:

Acetic Acid
Ammonium Hydroxide
Chromic Acid
Hydrobromic Acid
Hydrochloric Acid
Hydrofluoric Acid
Sulfuric Acid

Nitric Acid Oleum Perchloric Acid

Phosphoric Acid Postassium Hydroxide Sodium Hydroxide

Dry Cleaning Filtration Residues

Cooked powdered residue (perchloroethylene plants only), still residues, and spent cartridge filters containing perchloroethylene or valclene are hazardous and have the EPA Hazardous Waste Number F002.

Still residues containing petroleum solvents with a flash point less than 140°F are considered hazardous and have the EPA Hazardous Waste Number D001.

Heavy Metals and Inorganics

Heavy metals and other inorganic waste materials exhibit the characteristic of Toxicity and are considered hazardous if the extract from a representative sample of the waste has any of the specific constituent concentrations as shown in 40 CFR 261.24, Table 1. This may include dusts, solutions, wastewater treatment sludges, paint wastes, waste inks, and other such materials which contain heavy metals/inorganics (note that wastewater treatment sludges from electroplating operations are identified as F006). The following are evaluated in all TCLP tests:

Arsenic	D004
Barium	D005
Cadmium	D006
Chromium	D007
Lead	D008
Mercury	D009
Selenium	D010
Silver	D011

Ignitable Wastes

Ignitable wastes include any liquids that have a flashpoint less than 140°F, any non-liquids that are capable of causing a fire through friction, absorption of moisture, or spontaneous chemical change, or any ignitable compressed gas as described in 49 CFR 173.300 (for a complete description of ignitable wastes, see 40 CFR 264.21, Characteristic of ignitability). Examples are spent solvents (see also solvents), solvent still bottoms, ignitable paint wastes (paint removers, brush cleaners and stripping agents), epoxy resins and adhesives (epoxies, rubber cements and marine glues), and waste inks containing flammable solvents. Unless otherwise specified, all ignitable wastes have the EPA Hazardous Waste Number of DOO1.

Some commonly used ignitable compounds are:

Acetone	F003
Benzene	F005
n-Butyl Alcohol	F003
Chlorobenzene	F002
Cyclohexanone	F003
Ethyl Acetate	FC03
Ethylbenzene	F003
Ethyl Ether	F003
Ethylene Dichloride	D001
Methanol	F003
Methyl Isobutyl Ketone	F003
Petroleum Distillates	D001
Xylene	F003

Ink Sludges Containing Chromium and Lead

This includes solvent washes and sludges, caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead. All ink sludges have the EPA Hazardous Waste Number K086.

Lead-Acid Batteries

Used lead-acid batteries should be reported on the notification form only if they are not recycled. Used lead-acid batteries that are recycled do not need to be counted in determining the quantity of waste that you generate per month, nor do they require a hazardous waste manifest when shipped off your premises. Be sure you check your MSDS on used batteries to determine proper classification. Note: Special requirements do apply if you recycle your batteries on your own premises — see 40 CFR 266).

Lead Dross	D008
Spent Acids	D002
Lead-Acid Batteries	D008

Most other batteries (e.g., mercury, Ni-Cd) are to be recycled and not disposed of.

Pesticides

The pesticides listed below are hazardous. Wastes marked with an asterisk (*) have been designated acutely hazardous. (See section in this Resource Manual for more information.) For a more complete listing, see 40 CFR 261.32 and §261.33 for specific listed pesticides, and other wastes, wastewaters, sludges, and by-products from pesticide formulators. (Note that while many of these pesticides are no longer in common use, they are included here for those cases where they may be found in storage).

*Aldicarb	P070
*Aldrin	P004
Amitrole	U011
*Arsenic Pentoxide	P011
*Arsenic Trioxide	P012
Cacodylic Acid	U136
Carbamic Acid,	
Methylnitroso-Ethyl Ester	U178
Chlordane	U036
*Copper Cyanides	P029
1,2-Dibromo-3-chloropropane	U066
1,2-Dichloropropane	U083
1,3-Dichloropropene	U084
2,4-Dichlorophenoxy Acetic Acid	U240
DDT	U061
*Dieldrin	P037
Dimethylcarbamoyl Chloride	U037
*Dinitrocresol	P047
*Dinoseb	P020
Disodium Monomethanearsenate	D004
*Disulfoton	P039
*Endosulfan	P050
*Endrin	P051
Ethylmercuric Chloride	D009
*Famphur	P097
"Heptachlor	P059
Hexachlorobenzene	U127
Kepone	U142
Lindane	U129
2-Methoxy Mercuric Chloride	D009
Methoxychlor	D014

*Methyl Parathion	P071
Monosodium Methanearsenate	D004
*Nicotine	P075
*Parathion	P089
Pentachloronitrobenzene	U185
Pentachlorophenol	U242
Phenylmercuric Acetate	D009
*Phorate	P094
*Strychnine	P108
2,4,5-Trichlorophenoxy	
Acetic Acid	U232
2-2,4,5-Trichlorophenoxy-	
Propionic Acid	U233
*Thallium Sulfate	P115
Thiram	U244
*Toxaphene	P123
Warfarin	U248

Reactives

Reactive wastes include reactive materials or mixtures which are unstable, react violently with or form explosive mixtures with water, generate toxic gases, or vapors when mixed with water (or when exposed to pH conditions between 2 and 12.5 in the case of cyanide or sulfide bearing wastes), or are capable of detonation or explosive reaction when heated or subjected to shock (for a complete description of reactive wastes, see 40 CFR 261.23, Characteristic of reactivity). Unless otherwise specified, all reactive wastes have the EPA Hazardous Waste Number D003. The following materials are commonly considered to be reactive:

Acetyl Chloride Organic Peroxides
Chromic Acid Perchlorates
Cyanides Permanganates
Hypochlorites Sulfides

Spent Plating and Cyanide Wastes

Spent plating wastes contain cleaning solutions and plating solutions with caustics, solvents, heavy metals, and cyanides. Cyanide wastes may also be generated from heat treatment operations, pigment production, and manufacturing of anticaking agents. Plating wastes are generally Hazardous Waste Numbers F006 - F009, with F007 - F009 containing cyanide. Cyanide heat treating wastes are generally Hazardous Waste Numbers F010 - F012. See 40 CFR 261.32 for a more complete description of plating wastes.

Wood Preserving Agents

The wastewater treatment sludges from many wastewater treatment operations (from wood preserving operations) are considered hazardous (EPA Hazardous Waste Number K001 – bottom sediment sludges from the treatment of wastewater processes that use creosote and pentachlorophenol). In addition, unless otherwise indicated, specific wood preserving compounds are:

Chromated Copper Arsenate	D004
Creosote	U051
Pentachlorophenol	F027

9. Polychlorinated Biphenyls (PCBs)

There was a time when many high-voltage power transformers were constructed using polychlorinated biphenyls (PCBs) as an insulation agent. Since that time, Congress has determined that PCBs pose a hazard to the life and health of humans and animals and our environment. As a result, the U.S. Environmental Protection Agency (EPA) was assigned overall responsibility for the development, dissemination, inspection, and enforcement of regulations to fulfill the laws passed by Congress. New regulations are now out and the original regulations are published in 40 CFR 761. Although the National Park Service is fully responsible for compliance with the applicable regulations, the following are a few overall guidelines regarding PCB transformers, or transformers that have been contaminated with PCBs by having used PCB oils.

Action Item: If you have power transformers in your park, determine which units contain PCBs. When in doubt, contact the manufacturer or distributor, or your EPA regional office (phone numbers listed in the front of this book) for a determination.

Storage for Reuse

Transformers containing PCBs at any concentration may be stored for reuse. While there are no time limitations on this storage, transformers with concentrations of 50 parts per million (ppm) or greater (known or assumed) which are stored for reuse should be in a condition suitable for reuse. Equipment that is not suitable for reuse (e.g., out of date, no longer meets usage need, damaged, does not meet performance specifications) will be considered improperly disposed of. Units that are in storage for reuse are considered by EPA to be "in service" for purposes of this regulation. Also, as of October 1, 1985, the storage for reuse of PCB transformers (500 ppm or greater) that pose an exposure risk to food or feed, is prohibited [§761.30(a)(1)(i)].

EPA does not require nonfunctional transformers (regardless of PCB concentrations) to be placed into "storage for disposal" if you intend to repair and reuse the item. However, EPA may have grounds to enforce against lengthy. "storage for reuse" of equipment which is not reasonably expected to be placed back into service. The owner should be able to demonstrate good faith compliance with the intent of the storage for disposal requirements and complete any required servicing or repairs within a reasonable amount of time. Any item that is damaged and cannot be repaired for regulatory or technical reasons must be disposed of or placed into storage for disposal.

Storage for Disposal

All PCB and PCB-contaminated transformers must be dated when placed into storage for disposal [§761.65(c)(8)] and must be removed from storage and disposed of within one year [§761.65(a)].

The facility used to store PCB and PCB-contaminated transformers must comply with the "storage for disposal" requirements [§761.65(b)(1)].

Non-leaking PCB and PCB-contaminated transformers may be stored temporarily by the generator in an area that does not comply with the requirements for a PCB storage facility for up to 30 days from the date of their removal from service for disposal, provided that a notation is attached to each transformer indicating the date the item was removed from service [§761.65(c)(1)(i)], and placed into storage for disposal [§761.65(c)(8)].

Leaking PCB and PCB-contaminated transformers which are placed in PCB containers that comply with U.S. Department of Transportation (DOT) specifications [§761.65(c)(6)] with sufficient sorbent materials to absorb any liquid PCBs, may also be temporarily stored by the generator for up to 30 days provided that a notation is attached to the container indicating the dates the transformers were removed from service [§761.65(c)(1)(ii)], and placed into storage for disposal [§761.65(c)(8)]. Each container or drum used to store leaking PCB items must be marked in accordance with EPA marking and labeling requirements [§761.40(a)(1)].

Nonleaking and structurally undamaged PCB-contaminated transformers, that have not been drained of free-flowing dielectric fluid, may also be stored on pallets next to a PCB storage facility which meets the requirements for storage for disposal. This type of storage is permitted only when the storage facility has immediately available unfilled storage space equal to ten percent (10%) of the volume of the equipment stored outside the facility. The equipment stored outside the facility must be inspected for leaks weekly [§761.65(c)(2)], and a notation must be attached to each unit indicating the date the equipment was removed from service [§761.65(c)(1)] and placed into storage for disposal [§761.65(c)(8)].

Commercial storers now must seek approval to operate and demonstrate financial responsibility for closure of the facility under the new provisions of the Notification and Manifesting Rule which was published in the *Federal Register* on December 21, 1989.

Disposal

PCB transformers (500 ppm or greater) must be disposed of as follows:

- In an incinerator that complies with 40 CFR 761.70.
- In a chemical waste landfill which complies with 40 CFR 761.75 provided that: the transformer is first drained of all free-flowing liquid, filled with solvent, allowed to stand for at least 18 hours and then drained thoroughly. PCB liquids that are removed shall be disposed of by incineration under 40 CFR 761.60(a). Solvents may include kerosene, xylene, toluene, and other solvents in which PCBs are readily soluble. Precautionary measures should be taken, however, that the solvent flushing procedure is conducted in accordance with applicable safety and health standards as required by Federal or State regulations [§761.60(b)(1)(i)(B)].

• The PCB liquids that are removed, including the flushing solvent, must be disposed of in an incinerator that complies with 40 CFR 761.70, or by an alternative EPA-approved and permitted disposal method in accordance with 40 CFR 761.60(e).

PCB-contaminated transformers (from 50 to 499 ppm concentrations of PCBs) shall be disposed of as follows:

• By draining all free-flowing liquid from the transformer and disposing of the liquid in an incinerator that complies with 40 CFR 761.70; or, in a chemical waste landfill that complies with 40 CFR 761.75, if information is provided to the owner or operator of the chemical waste landfill that shows that the waste does not exceed 500 ppm PCBs and is not an ignitable waste as described in 40 CFR 761.75(b)(8)(iii); or, in an approved high efficiency boiler that complies with 40 CFR 761.65(a)(2)(iii); or by an alternative EPA approved and permitted disposal method that complies with 40 CFR 761.60(e) [§761.60(b)(4)].

The disposal of the drained contaminated equipment carcass is not regulated [§761.60(b)(5)(ii)]; however, drained PCB-contaminated transformer carcasses cannot be sold (distributed in commerce) for use as parts and components in repair or rebuilding activities.

There are no PCB disposal requirements for non-PCB transformers (less than 50 ppm PCBs). However, certain reuse restrictions apply to the less than 500 ppm PCB fluid. Waste oil with any detectable concentration of PCBs cannot be used as a sealant, coating, or dust control agent [§761.20(d)]; and also, can only be burned for energy recovery in specific combustion facilities described in 40 CFR 761.20(e)(1).

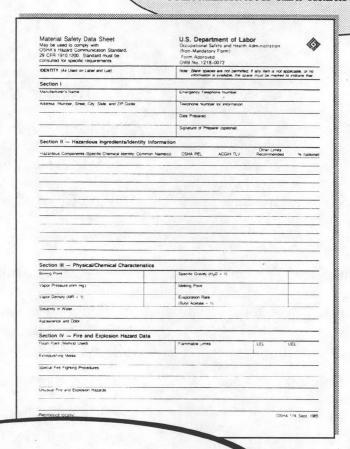
10. Potential Problem Products

The following automotive products are known to typically contain chlorinated solvents that can cause the spent products to be considered hazardous waste or can cause major cross contamination problems in your facility for used oil or for parts cleaning solutions.

For self-protection, examine the Material Safety Data Sheet (MSDS) for all such products in your facility. Also examine MSDSs for all proposed product purchases before allowing them on-site. If a product contains any one of these problem chemicals as a main ingredient or in concentrations greater than 10%, it would be advantageous to find alternatives to its use.

Brake Cleaner	1,1,1-Trichloroethane (TCA, Trich) and Perchloroethylene (PERC)
Parts Washing Solvent	Stoddard solvent and Mineral Spirits Toluene Xylene Benzene 1,1,1-Trichloroethane
• Gasket Remover	Methylene Chloride
Paint Stripper	Methylene Chloride
Carburetor Cleaner	Methyl Ethyl Ketone (MEK) Toluene Xylene
Oil Additives and Treatments	Chlorinated Paraffins
• Carburetor Cleaner and Cold Tank	Methylene Chloride Cresylic Acid Dichloro Benzene
Moisture Displacer	1,1,1-Trichloroethane
Aerosol Grease	1,1,1-Trichloroethane Methylene Chloride
Moisture Sealants	1,1,1-Trichloroethane
Dry Lubricants	1,1,1-Trichloroethane Methylene Chloride
Contact Point Cleaner	1,1,1-Trichloroethane

Material Safety Data Sheets are a Critical part of product control to avoid contamination and hazardous waste.



Remember, you can use the "CAS" system to identify unknown chemicals. BE INFORMED and BE IN CONTROL!

11. Material Safety Data Sheets

Chemical manufacturers and importers must develop a MSDS for each hazardous chemical they produce or import, and must provide the MSDS automatically at the time of the initial shipment of a hazardous chemical to distributors or users. Distributors must also ensure that employers are similarly provided a MSDS.



Each MSDS must be in English and include information regarding the specific chemical identity of the hazardous chemical(s) involved and the common names. In addition, information must be provided on the physical and chemical characteristics of the hazardous chemical; exposure limits; whether the chemical is considered to be a carcinogen; precautionary measures; emergency and first aid procedures; the identification of the organization responsible for preparing the sheet; and known acute and chronic health effects and related health information.

If you did not receive an MSDS with a product, you can obtain one by calling or writing to that product's manufacturer or distributor. They are required by law to prepare an MSDS and make it available to everyone that may use their product. The information contained in your MSDSs are key to your pollution prevention program and overall environmental management activities. Your overall objective is to reduce or eliminate the use of materials that have regulated chemicals. Review the MSDS for each new product to be sure that it does not contain substances that could make it subject to environmental regulations.

Identity

Be sure to verify that the MSDS was prepared for the product you are considering or have received. Do this by comparing the product name or number of interest with that printed on the MSDS. If they don't match, call your manufacturer or distributor and tell them you want one that was prepared *for* the product of interest. Don't accept substitute MSDSs; the manufacturer is required by law to have an MSDS for every product that they manufacture.

Section I - Manufacturer Information

This section tells about the manufacturer of the product and should include their name, address, and normal and emergency telephone numbers. Additionally, there is supposed to be a date when the MSDS was prepared, and who prepared it. Verify that the date of the MSDS is somewhat recent. If you suspect that there might have been a later MSDS prepared, or it is a very old date, call the manufacturer at the number provided and ask for the latest MSDS release for your product. In fact, if you have any questions, call the manufacturer at the number provided. You can usually call the manufacturer at the designated number and get updated or additional MSDSs, or in many cases, they will FAX you the most recent version.

If there is a health or safety emergency at your facility with a particular product, call the emergency number for specific assistance.

Every manufacturer must prepare and make available, an MSDS for each of their products.

Standardized MSDS Contents

Identity

Section I - Manufacturer Information

Section II - Hazardous Ingredients

Section III - Physical Characteristics

Section IV - Fire & Explosion Data

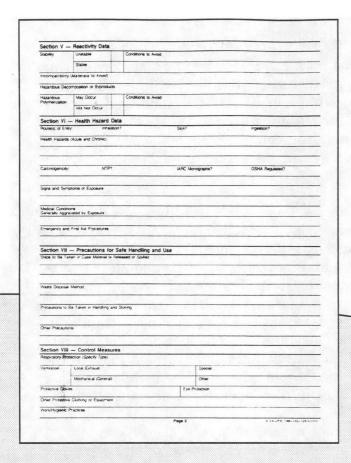
Section V - Reactivity Data

Section VI - Health Hazard Data

Section VII - Precautions for Handling

Section VIII - Control Measures

Material Safety Data Sheet May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910 1220 1230 12 must be consolided for speeck requirements.	U.S. Departr Occupational Sal (Non-Mandatory Form Approved OMB No. 1218-	lety and Health Form)		
IDENTITY (As Used on Laber and List)	Note: Blank spaces information is	are not permitted available, the spa	f any dem is not a ice must be marked	opicable or no to naica's that
Section I	190	100	REPORT - No. 19	185 L. S
Manufacturer's Name	Emergency Telepho	one Number		1100
Address (Number, Street, City, State, and ZIP Code)	Telephone Number	for information		DETERMINED
	Date Prepared			
	Signature of Prepar	rer (optional)		
Section II — Hazardous ingredients/identity information				
			Other Limits	
Hazardous Components (Specific Chemical Identity: Common Namo(s))	OSHA PEL	ACGIH TLV	Recommended	49 (Spitional)
Section III — Physical/Chemical Characteristics				
	Specific Gravity (H)	0 - 11		
Section III — Physical/Chemical Characteristics Boung Post		0 - 1)		
Section III — Physical/Chemical Characteristics Bowg Post Vacor Pressure (vm Hg.)	Metting Point	0 - 1)		
Section III — Physical/Chemical Characteristics Boung Post	Meiting Point Evaporation Rate			
Section III — Physical/Chemical Characteristics Bowg Post Vacor Pressure (vm Hg.)	Metting Point			
Section III — Physical/Chemical Characteristics Bowg Post Vapor Pressure (Pm Hg) Vapor Omery (ART 1) Srzeny in Wiese	Meiting Point Evaporation Rate			
Section III — Physical/Chemical Characteristics Bong Pow Vacor Pressure (rm Hg) Vacor Density (AR 1)	Meiting Point Evaporation Rate			
Section III — Physical/Chemical Characteristics Boung Post Vacor Pressure (mm Hg) Vacor Deman, IAR 1) Society in Water	Meiting Point Evaporation Rate		LEL	UEL
Section III — Physical/Chemical Characteristics Bown Post Vapor Pressure (PM Mg) Vapor Christy (ANT 1) Society in Water Georgians and Obor	Meting Point Evaporation Rate (Buryl Acetate = 1)		LEL	UEL
Section III — Physical/Chemical Characteristics Boing Poss Boing Poss Viscor Pressure (vm Hg) Viscor Demark (ARI 1) Society w Water - Appearance and Obor Section IV — Fire and Explosion Hazard Data Frain Pors (Mercod Use)	Meting Point Evaporation Rate (Buryl Acetate = 1)		LÉL	UEL
Section III — Physical/Chemical Characteristics Boung Poix Vivor Desert (vm Hg) Vivor Desert (ART 1) Society AVIIII Societ	Meting Point Evaporation Rate (Buryl Acetate = 1)		LEL .	UEL
Section III — Physical/Chemical Characteristics Bowg Post Vapor Pressure (Pm Hg) Vapor Omery (ARI 1) Soczeny a Wase - Operation and Obo Section IV — Fire and Explosion Hazard Data Faun Pros (Memoral Usin) Enrogisting Meda Siscout Fire Fighing Procedures	Meting Point Evaporation Rate (Buryl Acetate = 1)		LEL.	UEL



Material Safety Data Sheet

OSHA Form 174

MSDSs Are Critical to Your Facility

- Obtain most current for each product - Understand what chemicals you're buying -
- Keep it readily available for employees -
 - Take appropriate health precautions -
 - Take appropriate safety precautions -
 - Use to help determine waste category -



Section II - Hazardous Ingredients/Identity Information

This is one of the most important sections of the MSDS when you are evaluating products for potential use at your facility. The manufacturer is required by law to list every chemical substance that is regulated by federal environmental regulations, and in some cases, selected states, that are in the product. If the manufacturer states that there no regulated substances used, it is usually safe to assume you can use it in your operations and not be concerned about environmental regulations. Remember, the manufacturer is only required to list those substances that are *regulated*.

If there are substances listed in this section, you must look carefully at what it says. For example, you will find some chemical name or synonyms, its Chemical Abstract Service (CAS) number, and supporting information, including a percentage of that substance that is contained in the total volume of product. You may not recognize the chemical by the name used, and remember that one chemical can go by several names. However, the CAS number of a chemical always remains the same. If you are a chemist or are familiar with the more common regulated chemicals, you can make decisions by recognizing the name. The safer method of MSDS evaluation is to use the CAS number. All federal and most state environmental regulations, and supporting technical assistance publications include the CAS number with the chemical name. Compare the CAS number on the MSDS with those of the regulations to determine just how a substance in a product might be regulated.

To make this evaluation simpler, you can obtain, free of charge, the following EPA document: "Title III List of Lists, Consolidated List of Chemicals Subject to the Emergency Planning and Community Right-to-know Act (EPCRA) and Section 112(r) of the Clean Air Act, As Amended, Title III of the Superfund Amendments and Reauthorization Act of 1986, and Title III of the Clean Air Act Amendments of 1990," EPA 740-R-95-001. Call the EPCRA Hotline at (1-800) 424-9346 to get your free copy. One useful aspect of this document is that there are tables listing the chemical name alphabetically with the CAS Number, and another table listed numerically by CAS Number with the chemical name.

Another document you should obtain is the "NIOSH Pocket Guide to Chemical Hazards," published by the U.S. Department of Health and Human Services. This document can be obtained from the Government Printing Office for a nominal cost, or contact your Field Area Office for assistance. This handy publication lists many chemicals by name and CAS Number, and has considerable information on the chemical's synonyms, trade names and conversion factors, personal protection, health hazards, respirator requirements, chemical and physical properties, and exposure limits. If you have a CAS Number and don't know the chemical name, this publication has a CAS Name index. If you have the chemical name but not the CAS Number, it has a chemical name index.

In many MSDSs, the manufacturer will list the percentage of the total product for each hazardous substance. This is valuable in preparing your mass balance and waste stream models. For example, if you bought a gallon of a product that had 15% of a particular substance, you may release 0.15 gallons of that substance as a waste (air, water, or land) for each gallon used (unless the substance becomes a part of another product you pro-

duce). Sometimes you will find a range of percentages so the manufacturer can avoid disclosing the exact formula; use the highest percentage in your mass balance.

Section II will also include OSHA REL and ACGIH TLV values for each hazardous substance contained in that product. The OSHA REL is the recommended exposure limits (RELs) for that substance. These are usually time-weighted averages (TWA) concentrations for up to a 10-hour workday during a 40-hour workweek. The ACGIH TLV is the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value which refers to the airborne concentrations of substances and represents an exposure level under which most people can consistently work for 8-hour days without harmful effects. Refer to your NIOSH pocket guide for more complete explanations and health hazard explanations.

Section III - Physical/Chemical Characteristics

This section gives the physical description of the product, including the boiling point, vapor pressure, vapor density, specific gravity, melting point, evaporation rate, solubility in water, and appearance and odor. This is another important section as you develop your pollution prevention mass balance.

If you know the volume (e.g., gallons) of a hazardous material or substance, you will need to know the weight. This can be calculated by multiplying the specific gravity by the weight of one gallon of water (8.34). By our example above, if the specific gravity is 1.24, and you released 0.15 gallons, you can determine the following: each gallon of product weighs about 10.3 pounds, and you released about 1.5 pounds of the hazardous substance (as calculated by volume). Of course this is just an approximation, but it is a quick way to develop your mass balances. If the specific gravity is less than one, the product will float on water. If the specific gravity is larger than one, water will float on the product.

The solubility in water value is the amount of the product that will dissolve in water at room temperature. It is usually expressed as a percentage, or by a qualitative notation:

 $\begin{array}{lll} \text{negligible} & \text{less than } 0.1\% \\ \text{slight} & 0.1\% \text{ to } 1\% \\ \text{moderate} & 1\% \text{ to } 10\% \\ \text{appreciable} & \text{more than } 10\% \\ \text{complete} & 100\% \end{array}$

Section IV - Fire and Explosion Hazard Data

This section is primarily intended for your safety office to make sure they understand the fire and explosion characteristics of the product. However, the flashpoint information is a very important parameter in your environmental management and pollution prevention activities. Recall that a waste that has a flashpoint of 140°F or less is a characteristic hazardous waste, regardless of what it may contain. This means that if you buy a product that has no hazardous substances listed, and it has a flash point of 140°F or less, any wastes will have to be classified as hazardous. Therefore, in selecting products, make

sure they don't contain hazardous substances, and make sure the flash point is greater than 140°F.

Section V - Reactivity Data

This is an important section with regard to how to handle the product and possible wastes. This section is of particular interest to your facility safety personnel for storage and handling considerations.

Section VI - Health Hazard Data

This section is reserved for detailed information on the health concerns that the product may have. Safety personnel are especially concerned with this to ensure proper management of the safety protection devices for workers.

Section VII - Precautions for Safe Handling and Use

This section is reserved for detailed information on the safe handling, transfer, and storage concerns that the product may have. Safety personnel are especially concerned with this to ensure proper management of facility safety.

Section VIII - Control Measures

This section is reserved for detailed information on personal protection that may be needed for that product. Safety and health personnel are especially concerned with this to ensure proper management of the safety protection of workers.

37 / 1	D 1	~ .
National	Park	Service

12. Chemical Hazard Communication Program

About 32 million workers are potentially exposed to one or more chemical hazards. There are an estimated 575,000 existing chemical products, and hundreds of new ones being introduced annually. This poses a serious problem for exposed workers and their employers.

Chemical exposure may cause or contribute to many serious health effects such as heart ailments, kidney and lung damage, sterility, cancer, burns, and rashes. Some chemicals may also be safety hazards and have the potential to cause fires and explosions and other serious accidents.

Because of the seriousness of these safety and health problems, and because many employers and employees know little or nothing about them, the Occupational Safety and Health Administration (OSHA) has issued a rule called "Chemical Hazard Communication." The basic goal of the standard is to be sure employers and employees know about work hazards and how to protect themselves. This should help to reduce the incidence of chemical source illness and injuries.

The Hazard Communication Standard establishes uniform requirements to make sure that the hazards of all chemicals imported into, produced, or used in the United States workplaces are evaluated, and that this hazard information is transmitted to affected employers and exposed employees.

Chemical manufacturers and importers must convey the hazard information they learn from their evaluations to downstream employers by means of labels on containers and material safety data sheets (MSDSs). In addition, all covered employers must have a hazard communication program to get this information to their employees through labels on containers, MSDSs, and training.

This program ensures that all employers receive the information they need to inform and train their employees properly and to design and put in place employee protection programs. It also provides necessary hazard information to employees, so they can participate in, and support, the protective measures in place at their workplaces.

The Hazard Communication Standard is different from other OSHA health rules as it covers *all* hazardous chemicals. The rule incorporates a "downstream flow of responsibility of information" which means that producers of chemicals have the primary responsibility for generating and disseminating information, while users of chemicals must obtain the information and transmit it to their own employees.

Hazard Evaluation

The quality of your Hazard Communication Program depends on the adequacy and accuracy of the hazard assessment. Chemical manufacturers and importers are required

to review available scientific evidence concerning the hazards of the chemicals they produce or import, and to report the information they find to their employees and to employers who distribute or use their products.

The chemical manufacturers, importers, and any employers who choose to evaluate hazards are responsible for the quality of the hazards determinations they perform. Each chemical must be evaluated for its potential to cause adverse health effects and its potential to pose physical hazards such as flammability.

Written Hazard Communication Program

The first requirement to this chemical regulation dictates that employers must develop, implement, and maintain at the workplace a written, comprehensive hazard communication program. Most hazard communication programs include provisions for container labeling, collection and availability of material safety data sheets, and the training program. Your hazard communication program should include a list of hazardous chemicals in each work area and the means used to inform employees of the hazards of non-routine tasks. Your program needs to inform all contractors of potential chemical hazards and available protective measures.

The original written Hazard Communication Program should be maintained at the safety or environmental office. All employees should have access to copies of this program at established "safety bulletin boards" throughout the park. You should establish and maintain a list of the location of all "safety bulletin boards;" this list should also be made available to all employees and contractors.

13. Health Hazards

While safety hazards related to the physical characteristics of a chemical can be objectively defined in terms of testing requirements (e.g., flammability), health hazard definitions are less precise and more subjective. Health hazards may cause measurable changes in the body - such as decreased pulmonary function. These changes are generally indicated by the occurrence of signs and symptoms in the exposed employees - such as shortness of breath, a measurable but sometimes subjective feeling. Employees exposed to such hazards must be apprised of both this change in body function and the signs and symptoms that may occur to signal that change.

The determination of occupational health hazards is complicated by the fact that many of the effects or signs and symptoms occur commonly in non-occupationally exposed populations, so that effects of exposure are difficult to separate from normally occurring illnesses. Occasionally, a substance causes an effect that is rarely seen in the population at large, such as angiosaricomas caused by vinyl chloride exposure, thus making it easier to ascertain that the occupational exposure was the primary causative factor. More often, however, the effects are common, such as lung cancer. The situation is further complicated by the fact that most chemicals have not been adequately tested to determine their health hazard potential, and data do not exist to substantiate these effects.

There have always been attempts to categorize effects and to define them in various ways. Generally, the terms "acute" and "chronic" are used to delineate between effects on the basis of severity or duration. "Acute" effects usually occur rapidly as a result of short-term exposures, and are of short duration. "Chronic" effects generally occur as a result of long-term exposure, and are of long duration.

The acute effects referred to most frequently are those defined by the American National Safety Institute (ANSI) standard for Precautionary Labeling of Hazardous Industrial Chemicals (Z129.1-1982) - irritation, corrosivity, sensitization, and lethal dose. Although these are important health effects, they do not adequately cover the considerable range of acute effects which may occur as a result of occupational exposure, such as, for example, narcosis.

Similarly, the term chronic effect is often used to cover only carcinogenicity, teratogenicity, and mutagenicity. These effects are obviously a concern in the workplace, but again, do not adequately cover the area of chronic effects, excluding, for example, blood dyscrasias (such as anemia), chronic bronchitis, and liver atrophy.

The goal of defining precisely, in measurable terms, every possible health effect that may occur in the workplace as a result of chemical exposures cannot realistically be accomplished. This does not negate the need for employees to be informed of such effects and protected from them.

The environmental or safety officer of each Park should review the MSDS of each new product delivered to the Park. This review should, at a minimum, identify all potential health risks for employees, and appropriate safety considerations. This information should be made available to all supervisors and posted on the safety bulletin boards, and incorporated into the Hazard Communication Program.

Health Term Definitions

Angiosaricomas: Rapidly growing and destructive cancer of the lymphatics.

Blood dyscrasias: A blood disorder such as anemia (i.e., a condition in which

the blood is deficient in red blood cells, in hemoglobin, or

in total volume.

Carcinogenicity: The state of a substance or agent producing or inciting cancer.

Liver atrophy: A decreasing in size or wasting away of the liver.

Mutagenicity: the property of a chemical that causes the genetic

characteristics of an organism to change in such a way

that future generations are permanently affected.

Narcosis: A state of stupor, unconsciousness, or arrested activity

produced by the influence of narcotics or other chemicals.

Teratogenicity: A state, or relating to, causing developmental

malformations and monstrosities.

14. Preparing for and Preventing Accidents

Whenever you generate hazardous waste and store it on-site, you must take the precautions and steps necessary to prevent any sudden or accidental release to the environment. This means that you must carefully operate and maintain your facility to reduce the possibility of fire, explosion, or release of hazardous materials and wastes.

Your facility must have appropriate types of emergency communication and fire equipment for the kinds of waste handled at your site. You must also attempt to make arrangements with local fire, public, or hospital officials as needed to ensure that they will be able to respond to any potential emergencies that could arise. Some of the steps you may need to take to prepare for emergencies at your facility include:

- Installing and maintaining emergency equipment such as alarms, telephones or two-way portable radios, fire extinguishers (using water, foam, inert gas, or dry chemicals as appropriate to your waste type), hoses, automatic sprinklers, or spray equipment in your facility so that it is immediately available to your employees if there is an emergency.
- Providing enough room for emergency equipment and response teams to get into any area in your facility in the event of an emergency.
- Writing to local fire, police, and hospital officials or state or local emergency response teams explaining the types of wastes you handle and asking for their cooperation and assistance in handling emergency situations.
- Provide a formal Hazardous Waste training program to Park employees who deal with hazardous materials.

15. Planning for Emergencies

An emergency contingency plan is a plan that attempts to look ahead and prepare for any accidents that could possibly occur. It can be thought of as a set of answers to a series of "what if" questions. For example: "What if there is a fire in the area where hazardous waste is stored?" or "What if I have a spill of hazardous waste or one of my containers leaks?" Emergency procedures are the steps you should follow if you have an emergency, that is, if one of the "contingencies" or "what ifs" occurs. While a specific written contingency plan is not required, it may be a good idea to make a list of these questions and answer them on paper. This also may be helpful in informing your employees about their responsibilities in the event of an emergency. If you have an emergency:

- In the event of a fire, call the fire department and attempt to extinguish it using the appropriate type of fire extinguisher.
- In the event of a *spill*, contain the flow of hazardous waste to the extent possible and notify the National Response Center. The Center operates a 24-hour toll free number: 1-800-424-8802. As soon as possible, clean up the hazardous waste and any contaminated materials and soil.
- In the event of a fire, explosion or other release, immediately notify the National Response Center as required by Superfund regulations. (Superfund is the law that deals with the cleanup of spills and leaks of hazardous waste at abandoned hazardous waste sites.)

Emergency phone numbers and locations of emergency equipment must be posted near telephones and all employees must know proper waste handling and emergency procedures. You must appoint an employee to act as *emergency coordinator* to ensure that emergency procedures are carried out in the event an emergency arises. An emergency coordinator must be available 24 hours a day (at the facility or by telephone), and that person must know whom to contact and what steps to follow in an emergency.

It is important to avoid potential risks in this area. If you have a serious emergency and you have to call your local fire department or you have a spill that extends outside your facility or that could reach surface waters, immediately call the National Response Center (1-800-424-8802) and give them the information they ask for. If you didn't need to call, they will tell you so. But anyone who was supposed to call and does not is subject to a \$10,000 fine and a year in jail, or both.

16. Sample Environmental Policy Statements

The following are sample facility statements that convey management commitment to the concepts of pollution prevention. Such a policy statement is critical to facility acceptance and support of the NPS Park Environment 2000 Initiative.

l- c- ly i- ir
n- es .e. oe

undesirable effects on air, water, and land.

17. Aerosol Spray Cans: An Alternative Look

As part of your fluids management program, it has been recommended that all fluids be purchased in bulk and NOT in aerosol spray can form. There are now several manufacturers who produce effective aerosol spray can "look-alikes". Biomatik USA Corporation produces a polypropylene hand held, air-powered dispenser of bulk chemicals that is now being used as a key element in pollution prevention programs. This unique item is safe to use, requires no special tools or fixtures, can be reused, and is inexpensive and convenient. The primary pollution prevention advantages of this aerosol spray alternative includes:

- Elimination of aerosol and other limited-life dispenser cans and bottles; a potentially costly waste stream.
- Completely environmentally safe through the use of compressed air uses no hazardous or undesired propellant.
- Can be recharged so all product can be used eliminates waste product in sealed (aerosol) cans when propellant is exhausted.
- Can easily be reused many times, thereby eliminating spent aerosol cans and potentially hazardous wastes through unused RCRA-defined hazardous substances left in sealed cans.
- Can "host" many different products (light oils, chemicals, solvents, water, etc.). Caution must be exercised to verify bottle-substance compatibility to ensure long-term bottle integrity.
- Can be charged using built-in hand pump, or using standard (90 psi) compressed air lines.
- Rugged polypropylene construction for light to heavy industrial applications. Has the same general form as most aerosol canisters of today.
- Spray nozzles can easily be changed, with a wide variety of spray patterns available to match specific dispensing needs.
- Significantly more economical with a full six ounce product capacity compared to less than eight product ounces in 16-ounce aerosol containers.

National Distributor: Biomatik USA c/o Stark and Associates North Carolina 28202 (704) 332-5004

Environment	al Resource	Manual
THEOREM	ai nesounce	: :::::::::::::::::::::::::::::::::::::

V. Land Management Issues

1.	Xeriscape			 				.8	8
2.	Herbicides, Pesticides, and Insecticides			 				.9	0

1. Xeriscape

Lawn care requires significant resources (water, energy, labor) to maintain, and improved landscape design can minimize the use of resources while maintaining a yard's aesthetic value. Xeriscape is a form of landscape design that encourages water and energy efficiency. It relies upon seven basic principles: (1) proper planning and design; (2) appropriate use of turf; (3) efficient irrigation; (4) soil improvements; (5) mulching; (6) appropriate plant selection; and (7) maintenance to reduce water needs.

- 1. Planning and design: Low water use zones should be in low activity areas. In some high-use areas, turf is necessary and will most likely be in a moderate water use zone.
- 2. Appropriate use of turf: Achieving a significant reduction in landscape water consumption and maintenance can be done by reducing the size of water-sensitive lawns, and replacing them with shrub beds and groundcovers. Lawn areas should serve a useful purpose, such as erosion control or play areas. Irregular, hard-to-maintain shapes are difficult to mow and irrigate.
- 3. Efficient irrigation: Drip irrigation can be used for shrub and tree areas that require less water than grass. If plants are grouped according to their water needs, they can be watered more efficiently.
- 4. Soil improvements: The ideal soil for water and oxygen requirements of plant roots is one which takes water readily, permits easy movement through the root zone and retains approximately 25% water after drainage while permitting free drainage from pores occupying approximately 25% of the soil by volume (Dr. Murry Milford, National Xeriscape News, January/February, 1988). Mixing organic materials with soil increases porosity and, with decomposition, tends to improve aggregation. Such materials are most beneficial as mulches left on the soil surface where they impede evaporative losses of water while being porous enough to permit water to filter through.
- 5. Mulching: A mulch is a protective covering of various substances, especially organic, placed around plants to prevent evaporation of moisture, freezing of roots, and control of weeds. The general recommendation (Lorraine Billeaud, National Xeriscape News, March/April, 1988) is three to four inches of an organic mulch for best results. Grass clippings would create a very effective mulch.
- **6. Appropriate plant selection:** Plants should be selected and grouped according to their water, sun, and temperature needs. Many low water use plants exhibit vibrant color.
- 7. Appropriate maintenance: Regular maintenance preserves the beauty of the landscape. However, xeriscape changes usually result in decreased

maintenance. Less time is required for mowing if turf area is decreased, plants require minimal weeding and watering, irrigation management reduces watering time, and mulches improve soil quality. Mowing grass at the proper height (e.g., Saint Augustine at three inches, Bermuda and Zoysia at one inch) can conserve water (Douglas Welsch, National Xeriscape News, September/October, 1988). Mowing at relatively tall heights allows the grass to develop a deeper, more water-efficient root system. Taller grass blades also act as a living mulch, shading the ground and reducing soil moisture evaporation. As the grass grows taller, it grows slower and matures, thus requiring less water and mowing. Finally, applying fertilizer to the lawn at the proper time and in the proper amount (one to two pounds of nitrogen fertilizer per 1,000 square feet of lawn at one time, once in the spring and again in the fall) can save time, effort, and money by reduced mowing and watering.

According to Robb Swearengin (<u>National Xeriscape News</u>, November/December, 1987), water savings of 10% to 25% is possible in almost any existing landscape simply by managing an irrigation system more efficiently. With a few modifications to the system and improved horticultural practices such as adding mulches, pruning, trimming and repairing or replacing worn, damaged or improperly installed equipment, the savings can be increased into the 40% range. According to Douglas Welsh (<u>National Xeriscape News</u>, September/October 1988), a well-designed xeriscape can decrease maintenance by as much as 50%.

Gradual changes can have long-term resource savings. One way to reduce lawn care is to simply stop mowing, and create manicured meadows. This suggestion would work for areas that receive little traffic, in areas with large trees, where it would be aesthetically pleasing. Replacing high-maintenance flower beds with more drought-resistant plants and weed barrier fabric underneath can substantially reduce maintenance requirements for weeding and watering.

Reseeding turf areas could result in significantly lower costs for mowing (equipment maintenance and labor) and watering. Some grass varieties require minimal or no mowing because they grow so slowly. Several varieties survive with minimal water. It would cost about \$3,000 to \$4,000 per acre to hydroseed a new kind of grass, and \$1,500 to \$2,000 per acre to reseed with a more tolerant grass mixture. Both of these methods would require weakening or killing the previous grass with Round-Up before applying. The difference between these two methods derives entirely from the mulch system. Hydroseeding has a sprayed mulch over the seed and fertilizer that is very effective in retaining moisture and preventing wind damage to the germinating seeds. Reseeding requires another mulch source – hay, grass clippings, etc. that must be applied by the facility lawn crew.

For more information, contact your local water department (e.g., the Denver Water Department has extensive educational materials on Xeriscape), your state's land grant college extension service, as well as the Boulder Energy Conservation Center.

2. Herbicides, Pesticides, and Insecticides

An almost unlimited number of pesticides and herbicides are available for agricultural and yard use. The relative toxicity to animals, persistence in soil, and transport capabilities all influence the relative danger of these substances. The best choice is one that has a low transport potential, a short half-life, and a low acute toxicity. When choosing a herbicide, pesticide, or insecticide, these characteristics can be used as a basis for comparisons and selection.

This summary identifies most of the commonly used herbicides, pesticides, and insecticides together with some specific information on their active ingredients, intended use, possible environmental hazards, and application alerts. This list does not constitute an endorsement for any of these products. Consult your state or regional pollution prevention contact for less hazardous or nonhazardous alternatives for your specific objective.

In the following list, pesticides marked "Restricted Use" should no longer be used. Every pesticide, no matter what its hazard, should be applied according to the directions. Products that contain the following chemicals should be substituted for one that does not: Furadan, Gromoxone, and Diazinon; if products containing these chemicals are used, you must carefully follow the application directions.

Accent Sp (DuPont)

Active Ingredient:

Nicosulfuron

Use:

Herbicide for corn, General Use classification

Environmental Hazards: Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment rinsewater. Do not apply where or when conditions could favor runoff. Do not apply if a severe storm is expected within 24 hours.

Application: Apply Accent Sp at the rate of one soluble packet (2-2/3 ounces) per four treated acres for selective post emergence grass weed control. Apply Accent Sp when grasses are young and actively growing. For later-emerging weeds, a second application or a timely cultivation is required. Applications must include either a crop oil concentrate or a nonionic surfactant. The addition of ammonium nitrogen fertilizer is recommended. Accent Sp is rainfast in four hours.

Banvel (Sandoz Agro, Incorporated)

Active Ingredient: Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid)

Use: Herbicide for corn, General Use classification for most products

Environmental Hazards: For terrestrial uses, do not apply directly to water, or to areas where surface water is present. Do not contaminate water when disposing of equipment rinsewaters.

Application: Do not treat areas where either possible downward movement into soil or surface washing may cause contact of Banvel herbicide with the roots of desirable plants such as trees and shrubs. Apply only as directed.

Brom

Active Ingredient: Bromacil

Use: Herbicide for grasses and brush control, General Use classification

Environmental Hazards: Bromacil is highly toxic, but the product applied is usually very dilute. Bromacil binds lightly to particles, and can be transported readily through soil. It has a long half-life (60 days). Off-site leaching is the primary route by which it leaves the soil (National Pesticide Telecommunications Network).

Captan

Active Ingredient: Captan

Use: Fungicide, General Use

Environmental Hazards: Captan has a short persistence in soil (a half-life of one to ten days). It is not mobile, and was not detected by the EPA's nationwide groundwater pesticide survey. Most use on food crops is now banned because captan can cause cancer in laboratory animals (National Pesticide Telecommunications Network).

Curtail (DowElanco)

Active Ingredient: Clopyralid 3,6-dichloro-2-pyridinecarboxylic acid, alka

nolamine salts of the ethanol and isopropanol series

(7.5%), 2,4-dichlorophenoxyacetic acid, triiso

propanolamine salt (38.4%)

Use:

Herbicide for non-cropland, General Use classification for all products.

Environmental Hazards: Drift or runoff may adversely affect non-target plants. Do not apply directly to water, or to areas where surface water is present. Do not contaminate water when disposing of equipment rinsewater. Clopyralid is a chemical which can travel (seep or leach) through soil and under certain conditions contaminate groundwater which may be used for irrigation or drinking purposes. Users are advised not to apply clopyralid where soils have a rapid to very rapid permeability throughout the profile (such as loamy sand or sand) and the water table of an underlying aquifer is shallow, or to soils containing sinkholes over limestone bedrock, severely fractured surfaces, and substrates which would allow direct introduction into an aquifer.

Application: Curtail herbicide is recommended for selective, post emergence control of broadleaf weeds in wheat and barley not under-seeded with a legume, fallow cropland, rangeland and permanent grass pastures, land in the Conservation Reserve Program, and non-cropland. Apply only once per 12-month period, except for grass grown for seed. This product can affect susceptible broadleaf plants directly through foliage and indirectly by root uptake from treated soil. Therefore, do not apply Curtail directly to or allow spray drift to come in contact with alfalfa, or other desirable broadleaf crops.

Dzn Diazinon 14G (Ciba)

Active Ingredient: Diazinon

Use: Insecticide, Restricted Use classification, due to avian and

aquatic toxicity

Environmental Hazards: This product is highly toxic to birds, fish, and other wildlife. Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Application rates above those recommended significantly increase potential hazards to birds and waterfowl. Keep out of lakes, streams, and ponds. Do not apply directly to water, or to areas where surface water is present. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of equipment rinsewater.

Application: The EPA concluded that the hazard to birds from diazanon use on golf courses and sod farms outweighs the minor benefits, and that cancellation was the only appropriate action. The EPA is concerned about the hazard to birds from diazinon use on other sites (EPA Pesticide Fact Sheet, September 1986).

Dureban

Active Ingredient: Chlorpyrifors

Use: Pesticide, General Use classification

Environmental Hazards: Chlorpyrifors is highly toxic to aquatic organisms, but its potential for mobilization is low because it breaks down quickly, and it attaches strongly to soil.

Furadan 4F (FMC Corporation)

Active Ingredient: Carbofuran (44%)

Use: Insecticide-nematicide, Restricted Use classification

Environmental Hazards: This product is toxic to fish, birds and other wildlife. Birds feeding on treated ares may be killed. For waterfowl protection, do not apply immediately before or during irrigation, or on fields in proximity to waterfowl nesting areas, or on fields where waterfowl are known to repeatedly feed. Drift and runoff from treated areas may be hazardous to fish in neighboring areas. The use of Furadan 4F may pose a hazard to federally designated endangered or threatened species known to be found in certain areas: Attwater's Greater Prairie Chicken, Aleutian Canada Goose, and Kern Primrose Sphinx Moth. This product is highly toxic to bees exposed to direct treatment or residues on crops. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area. Carbofuran is a chemical which can travel (seep or leach) through soil and can contaminate groundwater which may be used as drinking water. Carbofuran has been found in groundwater as a result of agricultural use. Users are advised not to apply carbofuran where the water table is close to the surface and where the soils are very permeable (loamy sands).

Based upon data on acute health effects, the acute oral hazard of carbofuran is the same order of magnitude as fonophos, phorate, and terbufos, but is less than aldicarb, and greater than the other major alternatives. The environmental fate data indicate that carbofuran is highly mobile and has a potential to leach. The EPA concluded that in general carbofuran poses the greatest risk to birds as compared with other granular pesticides, including its alternatives. The EPA proposed to cancel granular carbofuran use on all sites because the risk to birds outweighs the benefits of use (EPA Pesticide Fact Sheet, No. 189, 1989).

Gromoxone Extra (Zeneca)

Active Ingredient: Paraquat dichloride

Use: Herbicide for weed and grass, Restricted Use

classification because of high mammalian toxicity

Environmental Hazards: This product is toxic to wildlife. Do not apply directly to water or to areas where surface water is present. Gromoxone Extra herbicide is a contact herbicide that kills all green plant tissue. Do not apply under conditions involving possible drift to food, forage or other plantings that might be damaged. Do not apply when weather conditions favor drift from areas treated. Clay and organic matter rapidly tie up Gromoxone Extra. As a result, it has no residual soil activity to affect later-planted crops or later-germinating weeds. Because it is rapidly absorbed by the weed foliage, rain occurring 30 minutes or more after application will have no effect on the activity of Gromoxone Extra.

Application: Gromoxone Extra should be applied to emerged weeds when they are small. Weeds one inch to six inches in height are the easiest to control. Larger weeds may be more difficult to control. In dry areas, dust stirred up by high winds or equipment tires can coat weed leaves and reduce Gromoxone Extra activity. Avoid applying in extremely dusty conditions. For alfalfa, rate per acre varies depending on growth stage, but about two pints per acre at the most is reasonable. Less than two pints per acre is the rate for corn. These refer to the broadcast rates, which mean 3/8 fluid ounces added to one gallon.

Malathion

Active Ingredient: Malathion

Use: Insecticide, General Use classification

Environmental Hazards: This pesticide is toxic to fish, aquatic invertebrates, and aquatic life stages of amphibians. Do not apply directly to water or to areas where surface water is present. Drift and runoff may be hazardous to aquatic organisms in areas near the application site. Do not contaminate water when disposing of equipment rinsewater. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Degradation in soil is rapid and related to the degree of adsorption. In raw river water, the half-life was less than one week, whereas malathion remained stable in distilled water for three weeks.

Orthoklor

Active Ingredient:

Chlorpyrifos

Use:

Pesticide, General Use classification

Environmental Hazards: Chlorpyrifos is highly toxic to aquatic organisms, but it breaks down quickly. It attaches strongly to soil particles, so mobilization danger is low (National Pesticide Telecommunications Network).

ProMagic

Active Ingredient:

Tetramethrin, d-phenothrin

Use:

Insecticide, General Use classification

Environmental Hazards: The primary environmental concern is for aquatic organisms, if it is directly applied to water.

Roundup (Monsanto Company)

Active Ingredient:

Glyphosate, n-(phosphonomethyl) glycine, in the form of

its isopropylamine salt

.Use:

Herbicide, General Use classification for most products

Environmental Hazards: Do not apply directly to water, to areas where surface water is present. Do not contaminate water when disposing of equipment rinsewater. Glyphosate has moderate persistence with a typical field half-life of 47 days. All crops can be planted immediately after application due to strong adsorption to soil.

Application: Avoid contact with foliage, green stems, exposed non-woody roots or fruit or crops, desirable plants and trees, since severe injury or destruction may result. Rainfall or irrigation occurring within six hours after application may reduce effectiveness. Heavy rainfall or irrigation within two hours after application may wash the chemical off the foliage and a repeat treatment may be required. Avoid drift. Extreme care must be used when applying this product to prevent injury to desirable plants and crops. For applications made on a spray-to-wet basis, spray coverage should be uniform and complete. Do not spray to the point of runoff. When using in less than complete coverage, use a 5% solution (five quart to 25 gallons) for annual and perennial weeds and a 5to 10% solution for woody brush and trees.

Valent X-77

Active Ingredient:

Diquat dibromide

Use:

Herbicide, General Use classification

Environmental Hazards: Valent X-77 is a moderately toxic chemical, to which cows are particularly sensitive. However, it leaves no trace in plant, soil, or water. It is strongly adsorbed to most soil particles, so there is a small potential for groundwater or surface water contamination (National Pesticide Telecommunications Network).

Weedmaster (Sandoz Agro)

Active Ingredient:

Dimethylamine salt of dicamba, and dimethylamine salt

of 2,4-dichlorophenoxyacetic acid

Use:

Herbicide, General Use classification for most products.

Environmental Hazards: This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, or to areas where surface water is present. Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites.

Application: Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Do not treat areas where either possible downward movement into soil or surface washing may cause contact of Weedmaster Herbicide with the roots of desirable plants such as trees and shrubs.

2.4-D

Active Ingredient:

2,4-Dichlorophenoxyacetic acid

Use:

Broadleaf Herbicide, General Use classification

Environmental Hazards: This product is toxic to fish. Drift or runoff may adversely affect fish and non-target plants. Do not apply to water or to areas where surface water is present. Do not contaminate water when disposing of equipment rinsewater. Do not contaminate water used for irrigation or domestic purposes. 2,4-D is potentially mobile, but rapid degradation in soil and removal from soil by plant uptake minimizes leaching. It undergoes microbial breakdown in warm, moist soil. Rate of breakdown increases with increased temperature, moisture, pH, and organic matter content.

			\sim	
Nation	al P	ark	Se	TVICE

Application: Most cases of groundwater contamination involving 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies.

Fertilizer/Pesticide Storage and Handling

Storage facilities should be a secured, single-use area, separate from other activities and storage (feed, seed, and fuel). Federal law requires that concentrated pesticides be stored in a secured area. Therefore, outdoor storage containers should be located within a permanently fenced area. Whenever possible, you should minimize storage of chemicals to avoid the associated risks (CSU Cooperative Extension, Best Management Practices for Pesticide and Fertilizer Storage and Handling, August, 1994).

Environments	il Kesource	Manual

VI. Supporting Information

1.	Definitions / Glossary
2.	Abbreviations and Acronyms11
3.	Pollution Prevention and Environmental Assistance

Definitions/Glossary

Acid

a corrosive solution with a pH less than 7.

Acutely Hazardous Waste

waste that EPA has determined to be so dangerous in small amounts that they are regulated the same way as are large amounts of other hazardous wastes. Examples include certain pesticides and dioxin-containing waste.

Angiosaricomas

rapidly growing and destructive cancer of the lymphatics.

Blood Dyscrasias

a blood disorder such as anemia (i.e., a condition in which the blood is deficient in red blood cells, in hemoglobin, or in total volume).

Boiler

means an enclosed device using controlled flame combustion and having the following characteristics

- (i) The unit has physical provisions for recovering and exporting energy in the form of steam, heated fluids, or heated gases;
- (ii) The unit's combustion chamber and primary energy recovery section(s) are of integral design (i.e., they are physically formed into one manufactured or assembled unit);
- (iii) The unit continuously maintains an energy recovery efficiency of at least 60 percent, calculated in terms of the recovered energy compared with the thermal value of the fuel;
- (iv) The unit exports and utilizes at least 75 percent of the recovered energy, calculated on an annual basis (excluding recovered heat used internally in the same unit, for example, to pre-

heat fuel or combustion air or drive fans or feedwater pumps); and

(v) The unit is one which the Regional Administrator has determined on a case-by-case basis, to be a boiler after considering the standards in 40 CFR 260.32.

Burner

means the owner or operator of any boiler or industrial furnace that burns hazardous waste fuel for energy recovery and that is not regulated as a RCRA hazardous waste incinerator.

Carcinogenicity

the state of a substance or agent producing or inciting cancer.

Chemical

means any element, chemical compound, or mixture of elements and/or compounds.

Chemical name

means the scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazardous evaluation.

Combustible liquid

means any liquid having a flashpoint at or above 100°F (37.8°C), but below 200°F (93.3°C), except any mixture having components with flashpoints of 200°F (93.3°C), or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.

Common name

means any designation or identification such as code name, code number, trade name, brand name, or generic name used to identify a chemical other than by its chemical name.

Compressed gas

means:

- (i) a gas or mixture of gases having, in a container, an absolute pressure exceeding 40 pounds per square inch (psi) at 70°F (21.1°C); or
- (ii) a gas or mixture of gases having, in a container, an absolute pressure exceeding 104 psi at 130°F (54.4°C) regardless of the pressure at 70°F (21.1°C); or
- (iii) a liquid having a vapor pressure exceeding 40 psi at 100°F (37.8°C) as determined by ASTM D-323-72.

Disposal

means the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into on on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including groundwaters.

Container

means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

Distributor

means a business, other than a chemical manufacturer or importer, which supplies hazardous chemicals to other distributors or to employers.

Employee

means a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

Employer

means a person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.

EPA Identification Number

means the number assigned by EPA to each generator, transporter, and treatment, storage, or disposal installation.

Explosive

means a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or high temperature.

Exposure/exposed

means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact, or absorption, etc.), and includes potential (e.g., accidental or possible) exposure.

Flammable

means a chemical that falls into one of the following categories:

- (i) "aerosol, flammable" means an aerosol that, when tested by the method described in 16 CFR 1500.45, yields a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back to the valve) at any degree of valve opening;
- (ii) "gas, flammable" means:
 - (a) a gas that at ambient temperature and pressure, forms a flammable mixture with air at a concentration of 13 percent (13%) by volume or less; or
 - (b) a gas that at ambient temperature and pressure, forms a range of flammable mixture with air wider than 12 percent (12%) by volume, regardless of the lower limit.

(iii) "liquid, flammable" means any liquid having a flashpoint below 100°F (37.8°C), except any mixture having components with flashpoints of 100°F (37.8°C) or higher, the total of which make up 99 percent (99%) or more of the total volume of the mixture:

(iv) "solid, flammable" means a solid, other than a blasting agent or explosive as defined in §190-109(a), that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serous hazard. A chemical shall be considered to be a flammable solid if, when tested by the method described in 16 CFR 1500.44, it ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis.

Flashpoint

means the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite when tested as follows:

- (i) Tagliabue Closed Tester (see American National Standard Method of Test for Flash Point by Tag Closed Tester, Z11.245 1979 (ASTM D55-79)) for liquids with a viscosity of less than 45 Saybolt University Seconds (SUS) at 100°F (37.8°C), that do not contain suspended solids and do not have a tendency to form a surface film under test; or
- (ii) Pensky-martens Closed Tester, (see American National Standard Method of Test for Flash Point by Pensky-Martens Closed Tester, Z11.7 1979 (ASTM D93-79)) for liquids with a viscosity equal to or greater than 45 SUS at 100°F (37.8°C), or that contain suspended solids,

or that have a tendency to form a surface film under test; or

(iii) Setaflash Closed Tester (see American National Standard Method of Test for Flash Point by Setaflash Closed Tester (ASTM D3278-78)). Organic peroxides, which undergo autoaccelerating thermal decomposition, are excluded from any of the flashpoint determination methods specified above.

Foreseeable emergency

means any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.

Generator

means any person, by site, whose act or process produces hazardous waste identified or listed in 40 CFR Part 261.

Hazardous chemical

means any chemical which is a physical hazard or a health hazard.

Hazard warning

means any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the hazard(s) of the chemical(s) in the container(s).

Hazardous waste

means a hazardous waste as defined in 40 CFR 261.3.

Hazardous waste fuel

means hazardous waste and any fuel that contains hazardous waste that is burned for energy recovery in a boiler or industrial furnace that is not subject to regulation as a RCRA hazardous waste incinerator. However, the following hazardous waste fuels are subject to regulation as used oil fuels:

(i) Used oil fuel burned for energy recovery that is also a hazardous waste solely because it

exhibits a characteristic of hazardous waste identified in Subpart C of 40 CFR Part 261; and

(ii) Used oil fuel mixed with hazardous wastes generated by a small quantity generator subject to 40 CFR 261.5.

Health hazard

means a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term "heath hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neuotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.

Identity

means any chemical or common name which is indicated on the material safety data sheet (MSDS) for the chemical. The identity used shall permit cross-references to be made among the required list of hazardous chemicals, the label and the MSDS.

Industrial boiler

means a boiler located on the site of an installation engaged in manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes.

Industrial furnace

means any of the following enclosed devices that are integral components of manufacturing processes and that use controlled flame combustion to accomplish recovery of materials or energy: cement kilns, lime kilns, aggregate kilns (including asphalt kilns), phosphate kilns, coke ovens, blast furnaces, smelting furnaces, refining furnaces, titanium dioxide chloride process oxidation reactors, methane reforming furnaces, pulping liquor recovery furnaces, combustion

devices used in the recovery of sulfur values from spent sulfuric acid, and other devices as the Administrator of EPA may add to this list.

Label

means any written, printed, or graphic material, displayed on or affixed to containers of hazardous chemicals.

Liver Atrophy

a decreasing in size or wasting away of the liver.

Mutagenicity

the property of a chemical that causes the genetic characteristics of an organism to change in such a way that future generations are permanently affected.

Mixture

means any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.

Off-specification used oil fuel

means used oil fuel that does not meet the specification provided under 40 CFR 279.11.

Organic peroxide

means an organic compound that contains the bivalent -0-0-structure and which may be considered to be a structural derivative of hydrogen peroxide where one or both of the hydrogen atoms has been replaced by an organic radical.

Oxidizer

means a chemical other than a blasting agent or explosive as defined in §1910.109(a), that initiates or promotes combustion in other material thereby causing combustion either of itself or through the release of oxygen or other gases.

Physical hazard

means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

Pyrophoric

means a chemical that will ignite spontaneously in air at a temperature of 130°F (54.4°C) or below.

Recycling

means if a material is used, reused, or reclaimed (40 CFR 261.1(c)(7)).

Source reduction

means any activity that reduces or eliminates the generation of hazardous or solid waste at the source, usually within a process (e.g., product substitution, process changes, housekeeping).

Storage

means the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.

Teratogenicity

a state, or relating to, causing developmental malformations and monstrosities.

Transportation

means the movement of hazardous waste by air, rail, highway, or water.

Transporter

means a person engaged in the off-site transportation of hazardous waste by air, rail, highway, or water.

Treatment

means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste nonhazardous, or less hazardous; safer to transport, store or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. Such term includes any activity or processing designed to change the physical form or composition of hazardous waste so as to render it nonhazardous.

Trade secret

means any confidential formula, patent, process, device, information or compilation of information that is used in an employer's business, and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it.

Used oil

means any oil that has been refined from crude oil, or any synthetic oil, that has been used, and as a result of such use, is contaminated by physical or chemical impurities.

Unstable (reactive)

means that a chemical which in the pure state, or as produced or transported, will vigorously polymerize, decompose, condense, or will become self-reactive under conditions of shocks, pressure, or temperature.

Waste minimization

means the reduction, to the extent feasible, of hazardous waste that is generated or subsequently treated, stored or disposed of. It includes any source reduction or recycling activity undertaken by a generator that results in either:

- (i) the reduction of total volume or quantity of hazardous waste; or
- (ii) the reduction of toxicity of the hazardous waste, or both, so long as such reduction is consistent with the goal of minimizing present and future threats to human health and the environment.

Water-reactive

means a chemical that reacts with water to release a gas that is either flammable or presents a health hazard.

Abbreviations and Acronyms

AD Estimated average electric demand

AD area x depth

ANSI American National Safety Institute

ASTM American Society of Testing and Materials

BLM Bureau of Land Management
BMP Best management practices

Btu British thermal unit

C₁ Conversion factor: 0.03413 therms per kWh

CAA Clean Air Act

CAS Chemical Abstract Service

CERCLA Comprehensive Environmental Response, Compensation

and Liability Act

CESQG Conditionally-Exempt Small Quantity Generator

CFC Chlorofluorocarbon

CES Community Energy Services Recycling, Riverton, Wyoming

CFR Code of Federal Regulations
CSU Colorado State University

CWA Clean Water Act

DEQ Department of Environmental Quality

DOT United States Department of Transportation

ECS Energy cost savings

EFF_e Efficiency of existing electric heater

 EFF_{σ} Efficiency of gas-fired heater

EMS Environmental Management System

EPA United States Environmental Protection Agency

EPCRA Emergency Planning and Community Right-to-know Act FIFRA Federal Insecticide, Fungicide, and Rodenticide Act

HazCom OSHA Hazard Communication

HMTC Hazardous Materials Transportation Act

ICM Integrated Crop Management IPM Integrated Pest Management

kW kilowatt (1,000 watts)

kWh kilowatt-hours lb/A pounds per acre

IUPAC International Union of Pure and Applied Chemists

LED Light emitting diode

LEPA low-energy precision application

LEPC Local Emergency Planning Committee

LQG Large Quantity Generator

M Mega (one million)

MM Btu Million Btu

MSDS Material Safety Data Sheet

N Nitrogen

NAAQS National Ambient Air Quality Standards

NESHAP National Emission Standard for Hazardous Air Pollutant

NFPA National Fire Protection Association

NO₃ Nitrogen Oxide

NPDES National Pollutant Discharge Elimination System

NRCS National Resource Conservation Society

OSHA Occupational Safety and health Administration

PCB Polychlorinated biphenyl

POTW Public Owned Treatment Works

ppm Parts per million

psi Pounds per square inch

Q Estimated heating load in kWh per year

QT flow x time

RCRA Resource Conservation and Recovery Act

PPA Pollution Prevention Act SDWA Safe Drinking Water Act

SERC State Emergency Response Commission SIC Standard Industrial Classification Code

SIP State Implementation Plan

SPCC Spill Prevention, Control and Countermeasure Plan

SQG Small Quantity Generator
TSCA Toxic Substance Control Act
TQM Total Quality Management

UCD Average electric demand rate (dollars per kW)
UCE Average electric energy rate per kWh (in dollars)

UCG Average gas rate (in dollars per therm)

UL™ Underwriter's Laboratory

USDA United States Department of Agriculture

UST Underground Storage Tank
VOC Volatile organic compound

WQDP Water Quality Demonstration Project

Pollution Prevention and Environmental Assistance

This Environmental Management tool kit was prepared especially for those national parks within the National Park Service Intermountain Field Area. Please see the other supporting document for an integrated approach to your environmental management program and the achievement of the goals of *Park Environment 2000 Initiative!*

Environmental Management for the National Park Service: A Tool Kit for Environmental Management is designed to guide you through the 14 most common waste streams at national parks and identify management reduction possibilities.

ENVIRONMENTAL MANAGEMENT
FOR THE

NATIONAL PARK SERVICE

Distribution of the part of the properties of the properties of the part of the p

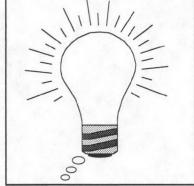
NATIONAL PARK SERVICE ENVIRONMENTAL RESOURCE MANUAL



The National Park Service Environmental Resource Manual will provide you with quick references to products and equipment suppliers and service providers. Remember, make all choices keeping in mind the principles of source reduction.

There are many sources for technical, compliance, and financial assistance.

Use them to your advantage!



Pollution prevention contacts at EPA's regional offices.

Professional and trade associations.

Trade journals and environmental publications.

Local and regional universities specializing in pollution prevention.

Technical consultants and non-profit assistance.

Department of Energy and Small Business Administration.

Federal, state, and special topic pollution prevention clearinghouses and on-line databases.

Your best source for all forms of assistance and referral are pollution prevention programs at the local, state, and federal level. They are there to assist you in decreasing your environmental footprint. Use them! This environmental management tool kit is a part of a series that has been prepared for a variety of organizations and is available to support local, state, and federal source reduction programs.

For more information, contact...

Recom Applied Solutions, Incorporated
2919 West 17th Street, Suite 207

Longmont, Colorado 80503
(303) 678-9603
(303) 678-9606 FAX
e-mail: recomjce@tesser.com

Recom is a small business that has been advancing the concept of pollution prevention since the 1980s. Recom works with organizations of all sizes, from all industries, offering pollution prevention programs, environmental management systems, and technical assistance. As a part of an integrated outreach program, Recom offers federal and state agency policy development and program integration, as well as training.

