

# **Hazardous Waste Self Audit**

Section: Waste Parts Washer Solvent

## **Section: Waste Parts Washer Solvent**

### Self-Audit Tips, Action Steps & Resources

Identifying your parts washer If you are confused about what type of parts washer you have or have questions about how to complete the self audit, call 612 -348-3777 for assistance.

#### For more information

See Solvent-Based Parts Washer at www.pca.state.mn.us/ publications/w-hw4-43.pdf.

See Water-Based (Aqueous) Parts Washer at www.pca.state.mn.us/ publications/w-hw4-44.pdf.

<u> </u>	<u>ar is</u>	wasner solvent
+	Refer	to the tips, action steps and resources to help you complete the audit.
1.	Does y	your business have a petroleum-solvent-based and/or water-based
	(aque	ous) parts washer?
		Yes, this business has a water-based (aqueous) parts washer. Stop here—submit this form, and download, complete and submit the Section: Water-Based (Aqueous) Parts Washer at www.hennepin.us/selfaudit.
	Ц	Yes, this business has a petroleum-solvent-based parts washer. Go to question 2.
		Yes, this business has both a water-based (aqueous) parts washer and petroleum-solvent-based parts washer. Download and complete the Section: Water-Based (Aqueous) Parts Washer at www.hennepin.us/selfaudit. Go to question 2.
2.	washe	u only clean oily parts in your petroleum-solvent-based parts r?  Yes. Go to question 3.  No. List what is clean off of parts:
3.	Does v	your solvent-based parts washer have a filter?
	-	Yes. Go to question 4.
		No. Go to question 5.
4.	How d	lo you manage used filters from your petroleum-solvent-based
	parts	washer?
		I store and dispose of my used parts washer filters with my used oil filters (this is acceptable as long as you are only cleaning oil off of parts, are a Very Small Quantity Generator (VSQG) and have obtained permission from your used oil filter hauler to mix these wastes).
		I store and dispose of my used parts washer filters separately. If you ship your used parts washer filters separately, go to www.hennepin.us/selfaudit and download the Management Plan Form 2 — Used Oil Filters and indicate on the form that the filters are from your parts washer.

☐ Other (describe):\_\_\_\_\_

□ Other (describe) \_\_

## Self-Audit Tips, Action Steps & Resources

# **Evaluating parts washing solvent**

Necessary laboratory tests include:

- Flash Point (°F)
- Toxicity Characteristic Leaching Procedure (TCLP) metals
- Total Volatile Organic Compounds (SW846-Method 8260)
- TCLP Volatile Organic Compounds

#### For more information

See Solvent-Based Parts Washer at www.pca.state.mn.us/ publications/w-hw4-43.pdf.

<b>5.</b>	Identify how you manage your waste petroleum-based parts washing
	solvent and any waste solids and sludges to determine the appropriate
	Management Plan Form 2(s):
	Lighin wests solvent off site Complete the Management Plan Form 2

ш	I ship waste solvent off site. Complete the Management Plan Form 2
	— Waste Petroleum-Based Parts Washing Solvent Shipped Off Site
	on page 4.
	I mix my waste solvent with used oil (VSQG only). Complete the
	Management Plan Form 2 — Waste Petroleum-Based Parts Washing
	Solvent Mixed with Used Oil on page 5.
	I recycle and reuse my parts washing solvent using a distillation unit.
	Answer the questions and complete the Management Plan Form 2s on
	pages 6 - 8.

# 6. Evaluating waste parts washing solvent, parts washer filters and parts washer solids and sludges.

Parts washing solvents are often advertised as "non-hazardous," "safe," "non-toxic," or "biodegradable." These characterization are sometimes not true or exaggerated. Additionally, even if true for the cleaning solvent itself, the parts washing solvent, filters, solids and sludges may become contaminated with flammable or toxic solvents and materials and/or metal -bearing oils and greases at levels that make the waste hazardous through the process of washing dirty parts.

Used parts washer solvent is considered a waste when you can no longer use it to clean parts, when you decide to dispose of it or, if you have a distillation or other reclamation unit, when you decide it needs to be recycled.

Hazardous waste generators are required to evaluate their spent parts washing solvent per guidelines outlined in *Minn. Rules* 7045.0214. Some businesses choose to assume their wastes are hazardous wastes because they know they are hazardous or they don't want to pay to test their wastes (often because they only generate a small amount of waste). If you decide to assume your waste is hazardous, you must manage it as hazardous waste.

- ☐ This business chooses to manage waste parts washing solvent as hazardous waste.
- □ This business has evaluated or will evaluate waste parts washing solvent per guidelines outlined in *Minn. Rules* 7045.0214. This business will submit test results within 60 days of the waste being generated showing the wastes were tested per the parameters listed in the tips.
- Note: You must evaluate the used parts washing solvent and related wastes not the product. You must manage waste parts washing solvent as hazardous waste until you have obtained evaluation results that show whether the waste parts washing solvent is hazardous or non -hazardous. Samples for testing must be taken when the waste solvent is ready to be disposed of or recycled through distillation.

## Self-Audit Tips, Action Steps & Resources

# 7. Requirements for mixing waste petroleum-based parts washing solvent with used oil

Waste petroleum-based parts washing solvent and/or sludge that is only hazardous for being ignitable may be mixed with used oil if you are a VSQG (you generate less than 220 pounds or about 22 gallons of non-acute hazardous waste per month), you obtained permission from your used oil hauler and you meet the following requirements:

- The solvent is not halogenated (does not contain chlorine, bromine or fluorine). Brake and carburetor cleaners are often halogenated (e.g. chlorinated).
- The solvent is not an F-listed waste (Exception: F003 ignitable only solvents may be mixed with used oil in certain circumstances).
- The solvent is not gasoline.
- The solvent (and any sludge) does not exceed 10 percent of the total volume of the final mixture.
- The flash point of the waste solvent is above 100 degrees Fahrenheit.
- Do not mix paint, ink or waste-containing paint or ink with your used oil.
- Record each time you mix your waste parts washing solvent and/or waste sludge with your used oil in a log. The log must be kept for at least three years and contain:
  - Date
  - Source of the waste
  - Volume of the solvent and/or sludge waste
  - Volume of the used oil into which the waste solvent and/or sludge was mixed
- ☐ I understand and follow the legal requirements for mixing waste petroleum-based parts washing solvent with used oil.
- → Report the annual total amount of waste parts washing solvent generated by your business in Management Plan Form 2 Parts Washing Solvent (Mixed with Used Oil) on page 5.

# Instructions for filling out the Management Plan Form 2

C. Year waste first generated: Estimate if unknown.

**D. Shipment or treatment frequency:** For example: 2 times per 1 year. Write "to be determined" if you are unsure how often the waste will be disposed.

**G. Type of waste storage container:** Storage containers must be:

- Compatible with the waste (will not react with, be affected by, or absorb contents)
- Sturdy and leak-proof (will not leak when overturned or bumped)

**I.** Amount generated per year: If you don't have a history of the amount of waste generated, estimate the amount that will be generated in a year.

G. Labeling and storage: If the solvent is inside the parts washer, the parts washer need not be labeled. However, if the waste solvent is stored in a container prior to pick up and is not mixed with used oil, the container must be labeled as "Hazardous Waste," with a clear description of the waste (e.g., used solvent) and with an accumulation start date.

\*K./L.M./N. Transporter/
Disposer: See Hazardous
Waste Disposal Companies
factsheet to find a transporter
and disposer. The factsheet may
be included with the self audit
or can be downloaded at
www.hennepin.us/
hazwastedisposalcompanies.

Contact your hazardous waste transporter/disposer for their EPA ID number.

# Management Plan Form 2 — Waste Petroleum-Based Parts Washing Solvent (Shipped Off Site)

Report how you manage or will manage your wastes. Call 612-348-3777 for assistance.

- $\leftarrow$  Refer to the instructions for more information.
- A. Waste name: Petroleum-Based Parts Washing Solvent
- **B.** Four-digit hazardous waste code: □ D001 □ Other (specify): \_\_\_\_\_
- C. Year waste was first generated at the site under current ownership: \_\_\_\_\_
- **D. Frequency of shipment:** \_\_\_\_\_ times per \_\_\_\_\_ year
- E. Source or process of generation (check all that apply):

$\square$ Cleaning parts (list)	
☐ Other (specify):	

F. On-site management of waste (select one):

☐ Stored for ship:	ment (You ship	or will ship yo	our waste to a	disposal or	recycling facility)
☐ Other (specify)					

**G.** Type of waste storage container(s):

☐ Parts washer	□ Drum	☐ Original container
☐ Other (specify)		

**H. On-site storage location of the waste:**  $\square$  Indoors  $\square$  Outdoors  $\square$  N/A

I. Amount generated per year: \_\_\_\_ gallons or \_\_\_\_ pounds

J.	Disposal facility	management method	l (contact your	disposal	company if unknow	n)
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☐ Recycle	☐ Burn as fuel	☐ Incinerate
□ Other		

☐ Have not identified a disposal company

K. Transporter name\*:

or  $\square$  Self

☐ To be determined\*

. . . . .

N. Disposer EPA ID number: \_\_\_\_\_\_\_\_

Office use only

Phys. state:

Inv. ID:

Date entry & initials:

Storage container:

Billing code: Disposal method: Waste inactive:

# Instructions for filling out the Management Plan Form 2

C. Year waste first generated: Estimate if unknown.

**D. Shipment or treatment frequency:** For example: 2 times per 1 year. Write "to be determined" if you are unsure how often the waste will be disposed.

**G. Type of waste storage container:** Storage containers must be:

- Compatible with the waste (will not react with, be affected by, or absorb contents)
- Sturdy and leak-proof (will not leak when overturned or bumped)

I. Amount generated per year: If you don't have a history of the amount of waste generated, estimate the amount that will be generated in a year.

J. Labeling and storage: If the solvent is inside the parts washer, the parts washer need not be labeled. However, if the waste solvent is stored in a container prior to pick up and is not mixed with used oil, the container must be labeled as "Hazardous Waste," with a clear description of the waste (e.g., used solvent) and with an accumulation start date.

\*L./M./N./O. Transporter/
Disposer: See Hazardous
Waste Disposal Companies
factsheet to find a transporter
and disposer. The factsheet may
be included with the self audit
or can be downloaded at
www.hennepin.us/
hazwastedisposalcompanies.

Contact your hazardous waste transporter/disposer for their EPA ID number.

Management Plan Form 2 — Parts Washing Solvent (Mixed with Used Oil) Report how you manage or will manage your wastes. Call 612-348-3777 for assistance.  ← Refer to the instructions for more information.
A. Waste name: Petroleum-Based Parts Washing Solvent (Mixed with Used Oil)
<b>B. Four-digit hazardous waste code:</b> □ D001 □ Other (specify):
C. Year waste was first generated at the site under current ownership:
D. Frequency of shipment or treatment: times per year
E. Source or process of generation (check all that apply):  □ Cleaning parts (list) □ Other (specify):
F. On-site management of waste (select one):  □ Mixed with used oil □ Mixed with other wastes (list) □ Other (specify)
G. Type of waste storage container(s):  □ Drum □ Pail □ Original container □ Aboveground storage tank □ Belowground storage tank □ Other (specify)
<b>H. On-site storage location of the waste:</b> $\square$ Indoors $\square$ Outdoors $\square$ N/A
I. Amount generated per year: gallons or pounds
J. Check that you understand and follow the requirements for mixing waste parts washing solvent with used oil:  ☐ I keep or will start to keep a log that specifies: Date, source of waste, volume of solvent and/or sludge waste, volume of used oil into which waste solvent and/or sludge was mixed.  ☐ The waste solvent (and any sludge) does not exceed 10% of the total volume of the final mixture.  ☐ The solvent is not F-listed (exception: F003 ignitable only solvents)  ☐ The solvent is not halogenated (e.g. chlorinated)
K. Disposal facility management method (contact your disposal company if unknown)  □ Recycle □ Burn as fuel □ Incinerate □ Other □ Have not identified a disposal company
L. Transporter name*: or □ Self □ To be determined*
M. Transporter EPA ID number:
N. Disposer name*:  or □ To be determined*
O. Disposer EPA ID number:
Office use only Phys. state: Storage container: Billing code: Inv. ID: Disposal method: Waste inactive:

### Self-Audit Tips, Action Steps & Resources

Complete the following questions and Management Plan Form 2s if you have a parts washer with a distillation unit.

#### Parts washer with distillation unit

If you have a parts washer with a distillation unit, You need to report both the amount of solvent you recycle and the oil and sludge generated through the distillation process.

→ Report the amount of used solvent recycled through distillation in Management Plan Form 2 — Used Petroleum-Based Solvent Recycled through Distillation on page 7.

#### Management of oil and sludge generated from distillation process

Oil and sludge generated through the distillation process must also be evaluated to determine if it is hazardous per *Minn. Rules* 7045.0214. If you decide to assume your waste sludge is hazardous, you must manage it as hazardous waste.

# 8. Do you mix your oil and sludge generated through the distillation process with your used oil?

- ☐ Yes. Answer question 9.
- □ No. Report the annual total of waste parts washing sludge generated in Management Plan Form 2 Waste Parts Washing Oil & Sludge from Distillation on page 8.

### 9. Requirements for mixing distillation sludge with used oil

Waste petroleum-based parts washing solvent and/or sludge that is only hazardous for being ignitable may be mixed with used oil if you are a VSQG (you generate less than 220 pounds or about 22 gallons of non-acute hazardous waste per month), you obtained permission from your used oil hauler and you meet the following requirements:

- The solvent is not halogenated (does not contain chlorine, bromine or fluorine). Brake and carburetor cleaners are often halogenated (e.g. chlorinated).
- The solvent is not an F-listed waste (Exception: F003 ignitable only solvents may be mixed with used oil in certain circumstances).
- The solvent is not gasoline.
- The solvent (and any sludge) does not exceed 10 percent of the total volume of the final mixture.
- The flash point of the waste solvent is above 100 degrees Fahrenheit.
- Record each time you mix your waste parts washing solvent and/or waste sludge with your used oil in a log. The log must be kept for at least three years and contain:
  - Date
  - Source of the waste
  - Volume of the solvent and/or sludge waste
  - Volume of the used oil into which the waste solvent and/or sludge was mixed
- ☐ I understand and follow the legal requirements for mixing waste parts washing solvent with used oil. Report the annual total of waste parts washing sludge generated in Management Plan Form 2 Waste Parts Washing Oil & Sludge from Distillation on page 8.

#### Halogenated solvents

Halogenated solvents are solvents that contain a halogen such as chlorine, fluorine, bromine or iodine. Some examples include:

- Dichloromethane (Methylene chloride)
- Trichloroethylene,
- Perchloroethylene (tetrachloroethylene)

Halogenated solvents may not be mixed with used oil and must be collected and disposed of separately.

#### For more information

See Solvent-based Parts Washer at www.pca.state.mn.us/ publications/w-hw4-43.pdf.

# Instructions for filling out the Management Plan Form 2

**C. Year waste first generated:** Estimate if unknown.

H. Amount stored prior to distillation: If your parts washer with distillation unit has a chamber that stores used solvent prior to distillation, report the amount the chamber holds in gallons or pounds.

If you store used solvent in containers outside of the parts washer prior to distillation, include this amount in your total.

# **Management Plan Form 2** — Used Petroleum-Based Solvent Stored Prior to Distillation

Report how you manage or will manage your wastes. Call 612-348-3777 for assistance.

- ← Refer to the instructions for more information.
- A. Waste name: Parts Washing Solvent (Distillation Unit)
- **B.** Four-digit hazardous waste code: □ D001 □ Other (specify): \_\_\_\_\_
- C. Year waste was first generated at the site under current ownership: \_\_\_\_\_
- **D.** How often do you distill your solvent: \_\_\_\_\_ times per \_\_\_\_\_ year
- E. Source or process of generation (check all that apply):

☐ Cleaning parts (list) _	 
☐ Other (specify):	

F. On-site management of waste (select one):

8	•	,	
☐ Recycled or reused on site			
☐ Other (specify)			

- **G.** On-site location of parts washer:  $\square$  Indoors  $\square$  Outdoors  $\square$  N/A
- H. Amount stored prior to distillation: \_\_\_\_\_ gallons or \_\_\_\_\_ pounds

Office use only

Phys. state: Storage container: OC Billing code:

Inv. ID: Disposal method: Recycled/reused on site

Date entry & initials: Waste inactive:

## Instructions for filling out the Management Plan Form 2

C. Year waste first generated: Estimate if unknown.

D. Shipment or treatment **frequency:** For example: 2 times per 1 year. Write "to be determined" if you are unsure how often the waste will be disposed.

G. Type of waste storage container: Storage containers must be:

- Compatible with the waste (will not react with, be affected by, or absorb contents)
- Sturdy and leak-proof (will not leak when overturned or bumped)

Labeling and storage: If the solvent and/or sludge is inside the parts washer, the parts washer need not be labeled. However, if the waste solvent/ sludge is stored in a container prior to pick up and is not mixed with used oil, the container must be labeled as "Hazardous Waste," with a clear description of the waste (e.g., used solvent) and with an accumulation start date.

I. Amount generated per **year**: If you don't have a history of the amount of waste generated, estimate the amount that will be generated in a year.

L.

\*L./M./N./O. Transporter/ **Disposer:** See Hazardous Waste Disposal Companies factsheet to find a transporter and disposer. The factsheet may be included with the self audit or can be downloaded at www.hennepin.us/ hazwastedisposalcompanies.

Contact your hazardous waste transporter/disposer for their EPA ID number.

#### Management Plan Form 2 — Waste Parts Washing Oil & Sludge from Distillation

Report how you manage or will manage your wastes. Call 612-348-3777 for assistance.

- ← *Refer to the instructions for more information.*
- A. Waste name: Petroleum-Based Parts Washing Solvent or Sludge
- **B.** Four-digit hazardous waste code:  $\square$  D001  $\square$  Other (specify):
- C. Year waste was first generated at the site under current ownership: \_\_\_\_\_
- **D. Frequency of shipment or treatment:** \_\_\_\_\_ times per \_\_\_\_\_ year
- E. Source or process of generation (check all that apply):

☐ Cleaning parts (list)
Other (specify):

F. On-site management of waste (select one):

☐ Mixed with used oil	☐ Mixed with other wastes (list)	
☐ Stored separately and s	shipped off site for disposal (If shipped off site, make sure	
you keep disposal records for at least 3 years)		
☐ Other (specify)		

G. Type of waste storage container(c).

Type of waste storage container(s):			
☐ Parts washer	☐ Drum	☐ Pail	☐ Aboveground storage tank
☐ Belowground sto	orage tank	☐ Other (sp	pecify)

- **H.** On-site storage location of the waste: □ Indoors □ Outdoors  $\square$  N/A
- I. Amount generated per year: \_\_\_\_ gallons or \_\_\_\_ pounds
- J. Check that you understand and follow the requirements for mixing waste parts washing sludge with used oil:

□ N/A—I do not mix oil and sludge from distillation with used oil ☐ I keep or will start to keep a log and follow the requirements listed in question 8 on page 6.

K.

<b>Disposal facility management method</b> (contact your disposal company if unknown)			
☐ Recycle	☐ Burn as fuel	☐ Incinerate	
☐ Other			
☐ Have not identified a disposal company			

Tra	ansporter name*:	
or	☐ Self ☐ To be determined*	

M. Transporter EPA ID number: \_\_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_

N.	Disposer name*:	
	or $\square$ To be determined*	

O. Disposer EPA ID number: \_\_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_

Office use only		
Phys. state:	Storage container:	Billing code:
Inv. ID:		Disposal method:
Date entry & initials:		Waste inactive: