

## HAZARDOUS MATERIALS PROGRAM ENVIRONMENTAL FACT SHEET

## Managing Hazardous Waste at Salvage Yards

This fact sheet is meant to assist salvage yard operators with understanding and following the requirements of the Vermont Hazardous Waste Management Regulations (VHWMR). If you have questions about the regulations or need assistance, please contact the Vermont Department of Environmental Conservation (DEC) Hazardous Materials Program using the information at the very bottom of this fact sheet. Also note there are many requirements that are *not* covered in this fact sheet that must be met in order to operate a permitted salvage yard. To contact the Vermont Salvage Yard Program, refer to the Resources and Contact Information section near the end of this fact sheet.

### **Are salvage yards regulated under the VHWMR?**

Yes. Most salvage yards in Vermont are very small quantity generators (VSQGs) of hazardous waste, and they must follow the basic requirements of the regulations when managing their hazardous waste, used oil, and other types of waste. Read below for examples of the types of wastes that are commonly generated at salvage yards and an overview of how they must be handled. Also note that if your salvage yard routinely generates hazardous waste, even in small amounts, you need to notify DEC and get an EPA ID number. Reach out to the Hazardous Materials Program to get started with completing these requirements.

### **What are the general requirements for storing containers of waste?**

The specific requirements depend on the types of waste you have at your salvage yard. In general, salvage yard operators must ensure that they do the following when storing containers of hazardous waste, used oil, and other types of waste:

- Label containers to show waste type (for example, “Hazardous Waste”, “Used Oil”, “Waste Batteries”).
- Make sure containers are in good condition, not leaking, and made of appropriate material (for example, oil should *not* be stored in plastic barrels for long periods; acidic waste should *not* be stored in metal drums).
- Keep all containers closed (do not leave 55-gallon drums or 5-gallon buckets sitting around without lids).
- Put containers on an impervious surface, such as a concrete pad (*not* outdoors on the ground).
- Store containers indoors; containers may be stored outdoors *only if* covered to protect from rain and snow (for example, a shed or outbuilding that has a roof).
- Make sure containers of liquids do not freeze.

### **What hazardous wastes are generated at salvage yards, and what must you do with them?**

Salvage yards generate hazardous wastes when working on vehicles and other machinery and when cleaning up spills. If you are recycling materials rather than disposing of them as hazardous waste, you need to make sure your hauler is transporting these materials to an appropriate recycling facility. The rules for storing hazardous waste onsite are listed above (see previous question). When you are ready to dispose of hazardous waste, you may either self-transport (if a VSQG) your own waste to a local solid waste district facility or hire a permitted hazardous waste hauler that will transport your waste to an appropriate facility. Examples of hazardous wastes generated at salvage yards include:

- **Waste gas**, commonly referred to as “bad gas”— this may be sent for recycling because it may have value as fuel. If you are recycling, be sure that your waste hauler is aware of this and is hauling to a

recycling facility. If you are *not* recycling, this waste must be sent offsite as hazardous waste. Bad gas is highly flammable and should be stored safely (for example, store containers inside a metal cabinet). On a related note, be aware that diesel may be recycled for energy recovery or sent offsite as hazardous waste.

- **Antifreeze** – if your spent antifreeze is *not* contaminated with other hazardous waste (such as fuel or oil), it may be sent for recycling. If you are recycling, be sure that your waste hauler is aware of this and is hauling to a recycling facility. If you are *not* recycling, spent antifreeze must be stored and sent offsite as hazardous waste.
- **Absorbents (for example, speedi-dri) contaminated with hazardous vehicle fluids** – you may reuse absorbent material until it is no longer absorbent. At that point, you have to store it and send it offsite as hazardous waste.

### **What do you need to do if you have a spill of oil, gas, or antifreeze?**

If there is a spill at your salvage yard, immediately work to stop the release. Use a barrier (for example, absorbent pads) to contain the spill and prevent it from entering storm drains or waterways. A spill of two gallons or more, or any spill that threatens human health or the environment (for example, a gallon of gas spilled into a stream) must be reported immediately (as the response allows) to the DEC Spill Team. After a spill is stopped and reported to DEC, the material must be cleaned up, and any hazardous material (for example, contaminated soil or absorbents) must be stored properly and sent offsite as hazardous waste. You may contact the DEC Spill Team by calling either:

- 1-800-641-5005 (24-hour Hazardous Materials Spills Hotline); or
- 802-828-1138 (DEC Spill Team during regular business hours (M-F 7:45 am - 4:30 pm EST))

### **What may be done with used oil?**

Used oil may be reused as a lubricant, given away to someone else that can burn it, or burned onsite in a space heater. If you are burning used oil, you need to confirm that it is not contaminated with chlorinated solvents. Used oil may also be sent to a facility that will recycle it or be taken to a local solid waste district facility. Used oil may *not* be disposed of in the trash or poured onto land or into waterways. The general requirements for storing containers of waste (see earlier question in this fact sheet) apply to used oil. Examples of used oil generated at salvage yards include:

- **vehicle crankcase oils**
- **transmission fluids**
- **power steering fluids**

### **What universal wastes are generated at salvage yards, and what must you do with them?**

“Universal” wastes are hazardous, but they are also extremely common and pose a low risk to human health and the environment. The most common examples of universal waste generated at salvage yards are listed below. The general requirements for storing containers of waste (see earlier question in this fact sheet) apply to universal waste. Also, a salvage yard that generates universal waste must be able to show that universal waste has been stored onsite for less than one year. This is usually done by marking the date on the container when it is first used to store universal waste and then shipping that container offsite within one year of that date. Examples of universal wastes that might be generated at salvage yards include:

- **Batteries** – spent lead acid batteries (common car batteries) may be reclaimed or regenerated. Otherwise, they should be managed as universal waste according to the general requirements for storing containers of waste and the rule above regarding the one-year time limit for onsite storage.

Salvage yard operators must *store leaking or damaged batteries in a closed container* that is in good condition.

- ***Switches containing mercury*** – these should be managed as universal waste according to the general requirements for storing containers of waste and the rule above regarding the one-year time limit for onsite storage. Salvage yard operators are allowed to remove mercury ampules (the tiny containers that hold mercury inside the switches) so long as this is done safely (in a ventilated space) and over a container (a tray or pan). Unbroken mercury ampules need to be stored in a way that prevents breakage (for example, wrapped with bubble wrap and placed in a cardboard box) and sent offsite as universal waste. Any broken ampules and the materials used for cleanup materials need to be sent offsite as hazardous waste.

### **What other types of waste must be managed according to the VHWMR?**

There are other types of wastes that are hazardous, but regulations allow you to send them offsite for reclamation (or reclaim them onsite) instead of disposing of them as hazardous waste (they are “exempt”). If you generate any of the wastes listed below at your salvage yard, handle them according to the general requirements for storing containers of waste (see earlier question in this fact sheet). Also, be aware that there are specific requirements that apply to dealing with exempt wastes onsite and sending them to specific types of facilities. Please contact the Hazardous Materials Program if you have any questions. Examples of wastes generated at salvage yards that may be exempt include:

- ***Scrap metal that is recycled***
- ***Soil contaminated with petroleum***
- ***used oil filters (non-terne plated)***

### **What requirements apply to managing old tires?**

Old tires are not regulated as hazardous waste in Vermont. However, they may *not* be disposed of as trash, and they may *not* be stockpiled onsite. Salvage yards with a large quantity of tires should work with a tire hauler/recycler that is permitted in Vermont.

### **Resources and Contact Information**

If you have questions about the topics covered in this fact sheet, please reach out to the Hazardous Materials Program (contact information at the end of this fact sheet). Guidance resources are also available on our website. For information pertaining to compliance with the Vermont Salvage Yard Rules, Statutes, and permitting, or for information related to complaints, please contact:

Frank Erickson, Salvage Yard Program Coordinator (802-461-6116; [frank.erickson@vermont.gov](mailto:frank.erickson@vermont.gov))

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***For more information regarding managing hazardous waste at salvage yards, or if you have other hazardous waste management questions, please contact:***

Hazardous Materials Program – Hazardous Waste Section  
Waste Management and Prevention Division  
Vermont Department of Environmental Conservation  
1 National Life Drive – Davis 1  
Montpelier, VT 05620-3704  
802-828-1138  
<https://dec.vermont.gov/waste-management/hazardous>