

HW Newsletter

Hazardous Materials Program
Waste Management and Prevention Division
Department of Environmental Conservation

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Managing HW at Schools

It is common practice for facilities management personnel to focus on maintenance of school property during the summer months. Schools should be aware that activities like cleaning, painting, vehicle and building maintenance, and purging of old supplies may involve the generation of hazardous waste. In Vermont, many K-12 schools generate hazardous waste and are regulated as very small quantity generators (VSQGs). These schools are subject to minimal hazardous waste standards that are applicable to this category of generators.

REQUIREMENTS AND RESOURCES

Schools that routinely generate hazardous waste, even in small amounts, are required to notify as a hazardous waste generator, obtain an EPA ID, and manage their hazardous waste according to the requirements for VSQGs established in [Subchapter 3](#) (Section 7-306) of the Vermont Hazardous Waste Management Regulations (VHWMR). Schools that conduct a *non-routine* activity involving the generation of

hazardous waste but that otherwise do not routinely generate hazardous waste must obtain a temporary ID. For example, if your school is cleaning out a chemical supply closet and must manage hazardous waste as part of this activity, a temporary ID is appropriate. The instructions and form for notifying, as well as the form for acquiring a temporary ID, may be accessed at the top of the [Hazardous Waste Forms and Documents](#) webpage.

To better understand the requirements for VSQGs, please refer to the [VSQG Guidebook](#). Schools might also benefit from a quick look over the [Hazardous Waste Management for Schools](#) webpage and [Fact Sheets](#) developed by DEC. Our Hazardous Waste and Solid Waste Programs are always available to answer any questions about managing waste at your school. Please feel free to reach out using the contact information at the end of this newsletter. The Hazardous Materials Program is also happy to offer compliance assistance visits (CAVs) to schools that are interested; refer to the “Keep an Eye Out” section of this newsletter for more information about this opportunity.

BEST MANAGEMENT PRACTICES

While the regulations for VSQGs do not require comprehensive planning for managing hazardous waste, it is a good idea for managers to consider implementing some basic procedures. School personnel should be aware that common locations associated with hazardous waste on school property include classrooms and storage areas dedicated to science and art; trades-related classrooms focused on automobiles, welding, and woodwork; custodial closets; maintenance sheds; and garages. Table 1 lists several tips for schools to keep in mind when dealing with materials in these areas.

Table 1: BMPs for Managing HW at Schools

<ul style="list-style-type: none"> • Create a team to manage hazardous waste; include a school administrator, facility manager, custodial lead, and teachers whose classes may involve hazardous waste generation.
<ul style="list-style-type: none"> • Identify and inventory all hazardous materials that are used and stored on school grounds. Limit the amounts that are onsite based on what is needed (e.g., procure only the materials necessary for one school year).
<ul style="list-style-type: none"> • Create a storage plan for hazardous waste; store in as few areas as possible and ensure that areas are kept clean, dry, and free of obstructions.
<ul style="list-style-type: none"> • Educate faculty and students about safety and the basics of the procedures that are being implemented.
<ul style="list-style-type: none"> • Exercise caution when dealing with materials that may be hazardous and note that materials not normally associated with hazards may still pose risks. Oil paints, pottery glaze, metal etching liquids, and chemicals for photography development may in fact be hazardous. Be sure to read labels and/or safety data sheets (SDSs), and make note of words like, "caution, toxic, danger, hazard, warning, poisonous, reactive, corrosive, flammable."
<ul style="list-style-type: none"> • If the contents of a container are unknown, ensure that trained individuals (e.g., school chemistry teachers or environmental health and safety professionals) accurately identify the contents and label them.
<ul style="list-style-type: none"> • Store all laboratory chemicals in their original container whenever possible.
<ul style="list-style-type: none"> • Make particular note of any containers with liquid contents that show evidence of crystallization. This may be indicative of reactive contents that will require special precautions. For example, picric acid, which can be used as a dye in chemistry experiments, may become explosive as it dries with age. Note that stabilization may be necessary prior to disposal of reactive waste, and this would require an emergency permit. Contact the Hazardous Materials Program for more information.
<ul style="list-style-type: none"> • Contact your local Solid Waste Management Entity for assistance with proper disposal of hazardous waste.
<ul style="list-style-type: none"> • If school personnel transport hazardous waste off-site, ensure that waste is packed in a way that will prevent a spill. If your school does not have the capacity to safely transport hazardous waste, you should work with a permitted hazardous waste hauler. Refer to the List of Permitted Transporters (check box "H" to view permitted <i>hazardous waste</i> haulers).

UPCOMING TRAINING OPPORTUNITY

Staff from DEC's Hazardous Materials and Solid Waste Programs look forward to presenting at the 66th Annual School Plant Operation & Maintenance Conference hosted by the Vermont School Custodians and Maintenance Association (VSCMA). DEC's presentation is titled "Waste Management of Chemicals, Cleaners, and Other Materials at Your School." Presenters plan to give an overview of the best management practices and requirements for handling both hazardous and non-hazardous wastes commonly generated at schools and will discuss proper management of cleaners, fluorescent lamps, paint, batteries, lab chemicals, art supplies, and unknown materials. Staff will also discuss how to make hazardous waste determinations, onsite storage, and transport. The conference is scheduled for June 20th at Hartford High School. Visit the [conference website](#) for more information and to register, and refer any questions to Kristi Tate (ktate@vtvsa.org, (802) 229-5834). •

"Schools that conduct a non-routine activity involving the generation of hazardous waste but that otherwise do not routinely generate hazardous waste must obtain a temporary ID."

Flood Awareness

As we head into summer, a time that many Vermonters look forward to, we also remember the flooding that took place across the state last July. In many areas, the work of rebuilding infrastructure and community continues as we approach the one-year mark. We know first-hand that managing waste is a small but important part of the bigger picture when it comes to flood response and recovery. And while we are hopeful that this summer's weather does not impact us in the same way that it did last July, we want to reiterate some observations and recommendations that we shared with you last year.

"If you are a business owner and you have questions about preparing for or recovering from a flood or other disaster, particularly as it relates to waste management, please contact us."

Countless businesses ranging in size from single proprietors to large facilities were impacted by last year's flooding. If your business is ever impacted by a flood event, be aware that damaged recyclables, food waste, and other solid waste may be thrown away in the trash. However, know that all impacted hazardous materials need to be handled as hazardous waste. To protect public health and the environment, as well as the people that

collect and haul waste, it is critical that flood-impacted businesses separate hazardous materials from their trash and ensure that their hazardous waste is transported to an appropriate destination. As for preparedness measures, if your facility is at risk of flooding, ensure that containers of hazardous materials and/or hazardous waste are not stored in areas that are susceptible to flooding. You should

avoid keeping drums outside even if they are empty.

There were over 200 reports of hazardous material releases related to last summer's flooding incident. If you are ever in a situation where you need to handle a release of hazardous material to the environment, whether it is due to flooding or any other event, please follow the procedures outlined in the [Hazardous Material Spill Response](#) fact sheet. More information can be found on the [Spill Program](#) webpage.

A majority of the releases that occurred last July were from aboveground storage tanks (ASTs). If you own or operate an AST (e.g., heating oil tank), and particularly if you are in a flood-prone area, please refer to DEC's [ASTs in Flood-Prone Areas](#) brochure. Also note that revised AST Rules will go into effect on August 1, 2024. While the rules were not revised specifically in response to last year's flooding, be aware that the revised rules require additional protection measures for ASTs that are installed in flood-prone areas. Additional information is available on the [Aboveground Storage Tanks](#) webpage.

If you are a business owner and you have questions about preparing for or recovering from a flood or other disaster, particularly as it relates to waste management, please contact us using the information at the end of this newsletter. ●

An Overview of Oily Wastes

Oily wastes are incredibly common across generator categories in Vermont due to the prevalent use of petroleum-based oil (oil) in many different applications. Fuel oil, kerosene, many lubricants, and automotive oil are all examples of oil. Wastes that contain oil at greater than 5% by weight are regulated as state-listed hazardous wastes in Vermont; they carry the VT02 waste code. Examples might include oil-contaminated absorbent pads or booms (see Figure 1), granular absorbents, and floor sweepings. As is the case for any other regulated waste, making an accurate waste determination is an important initial step in properly managing oily waste, and there are a few things to keep in mind when doing so.

“If an absorbent is reused until it is spent, it is very likely to contain greater than 5% oil by weight. Waste that is otherwise non-hazardous and contains equal to or less than 5% by weight oil may be disposed of as solid waste.”

MAKING A WASTE DETERMINATION

In order to know whether a waste is regulated as VT02 oily waste, generators must determine the percentage of the waste, by weight, that constitutes oil. For absorbents, the weight of the unused material can be compared with its weight after use to see if there has been an increase of greater than

5%. If so, the waste is most likely hazardous waste; however, note that dirt, water, and other constituents may account for some of the increased weight. If an absorbent is reused until it is spent, it is very likely to contain greater than 5% oil by weight. Waste that is otherwise non-hazardous and contains equal to



Figure 1: Example of absorbents being used for oil cleanup.

or less than 5% by weight oil may be disposed of as solid waste. Oil in the form of free liquid that is recovered by the wringing of absorbent material, or otherwise separated from materials contaminated with oil, may be managed as “used oil” according to [Subchapter 8](#) of the VHWMR.

When in doubt about the percentage of oil that a waste contains, generators may either opt to manage it as VT02 hazardous waste, or have the material tested prior to deciding on a management approach. Testing is particularly appropriate for oil-contaminated liquids, dirt, and debris; an analytical

lab should be consulted to test these types of waste for total petroleum hydrocarbons (TPH). If you expect to routinely generate the same waste stream, it is a good idea to have it tested initially.

Generators should also note that it is not uncommon for waste to contain characteristic and/or listed hazardous wastes in addition to oil. For example, waste contaminated with gasoline may carry multiple hazardous waste codes (e.g., D001, D018) in addition to VT02. Such waste must be managed in accordance with the requirements that apply to all applicable waste codes.

BE AWARE OF EXEMPTIONS

Subchapter 2 (Section 7-203) establishes conditional exemptions for various wastes, including specific wastes that contain oil. If you generate any of the wastes listed in Table 2 that contain oil at greater than 5% by weight, but are otherwise non-hazardous, they are not regulated as hazardous waste if the waste-specific management conditions under the exemption are met.

Table 2: Conditional Exemptions for Oily Waste

<ul style="list-style-type: none"> • Drained oil filters (§ 7-203(o))
<ul style="list-style-type: none"> • Reusable contaminated wipes to be sent off-site for cleaning (§ 7-203(w))
<ul style="list-style-type: none"> • Reusable absorbent material (§ 7-203(x))
<ul style="list-style-type: none"> • Petroleum-contaminated soil (§ 7-203(p)); note that this exemption is specifically intended for contaminated properties and includes many stringent conditions

IMPLEMENT PREVENTATIVE MAINTENANCE

In order to minimize the generation of oily waste, consider implementing a preventative maintenance program based on the practices listed in Table 3.

Table 3: Practices for Minimizing Oily Waste Generation

<ul style="list-style-type: none"> • If it is necessary to use absorbent materials to clean up an oil spill, use reusable pads or booms whenever possible. If not possible to use reusable materials, use absorbent materials that have a high absorbency-to-weight ratio, and use them until they are saturated.
<ul style="list-style-type: none"> • Use drip pans, funnels, or drain trays to catch and transfer fluids to appropriate containers.
<ul style="list-style-type: none"> • Keep floors free of excess dirt to prevent the dirt from being contaminated.
<ul style="list-style-type: none"> • Avoid sweeping dirt or debris into floor drains, troughs, or basins.
<ul style="list-style-type: none"> • If a spill occurs, use squeegees or oil-only wet-vacuums to focus on areas where liquids collect. Collected oil can then be managed as used oil.
<ul style="list-style-type: none"> • Keep a small supply of absorbent material on-site to clean up residual oil that cannot be collected.

RESOURCES ON OILY WASTE AND USED OIL

Please note that our [Oily Wastes](#) fact sheet expands on the summary information provided in this piece. To better understand the requirements that pertain to managing used oil, refer to the [Used Oil](#) and [Used Oil Burning](#) fact sheets. If you have questions about managing oily waste, please contact the Hazardous Material Program. •

Keep an Eye Out

We use this recurring section of the newsletter to keep you aware of upcoming deadlines and other important information. Please make note of the following:

HAZARDOUS WASTE GENERATOR REGISTRATION FEES

Thank you to all hazardous waste generators that paid their annual registration fee by the April 30 deadline. Per [10 V.S.A. § 6608\(f\)](#), generators are required to register, renew their registration annually, and pay an annual fee. If you have yet to do so, complete your payment using [ANR Online](#). Please refer to the [Generator Fees](#) webpage for more information.

TOXIC USE AND HAZARDOUS WASTE REDUCTION (TUHWR) PLANNING

Thank you to all the TUHWR planners that submitted your annual progress reports and annual fee payments by the March 31 deadline. If you are still working to submit your information, please note that the reporting form is accessible on the [TUHWR webpage](#), along with a fee payment calculator and additional resources. Annual fees are to be paid using the [ANR Online Services Portal](#). Please note that TUHWR planning is required by statute ([10 V.S.A. §§ 6623-6633](#)) for facilities that use toxic substances and/or generate hazardous waste beyond specific thresholds. Planning is intended to provide those facilities with a summary of their toxics use and hazardous waste generation and to facilitate the consideration of alternatives. If you are unsure whether your facility is required to plan, or if you have

further questions, please contact us using the information at the end of this newsletter.

COMPLIANCE ASSISTANCE VISITS (CAVs)

Please be aware that hazardous waste generators may request a CAV at any time. The primary goal of CAVs is to assist generators with following requirements of the VHWMR, and we offer them without the risk of enforcement. CAVs typically include a walkthrough of the areas in a facility where hazardous waste is generated and stored; a review of a facility's documentation, including profiles, manifests, and inventories; and post-inspection follow-up with directives for returning to compliance, if applicable. These visits create opportunities to discuss any issues or questions the generator may have regarding hazardous waste and the VHWMR. Our Program's approach is flexible, and the areas of focus can be adjusted based on the needs of the facility. If you are interested in a CAV, please contact us using the information at the end of this newsletter.

BATTERIES

Please be aware that Call2Recycle offers free collection for the recycling of single-use and rechargeable batteries, up to 11 pounds per battery. Refer to the [Call2Recycle website for Vermont](#) for more information on this program and contact information. For additional guidance on managing batteries as a hazardous waste generator, please refer to our [Managing Spent Batteries](#) fact sheet. ●

Guidance Resources

Our [Resources for Hazardous Waste Handlers](#) webpage includes links to guidebooks, fact sheets, webinar recordings, and more. If you have not already done so, we encourage you to bookmark the page as a reference. We will continue to add new information when it becomes available. If you have any questions or need assistance, please contact us using the information below. ●

FOR MORE INFORMATION PLEASE CONTACT:

Hazardous Waste Section

Hazardous Materials Program

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<https://dec.vermont.gov/waste-management/hazardous>