

Newsletter

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

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Upcoming Webinar

The Vermont Hazardous Waste Program (Program) is pleased to be offering a webinar, titled, “An Overview of Recent Changes to the Vermont Hazardous Waste Management Regulations (VHWMR).” The webinar is scheduled for **1:00-2:00 p.m. on August 11**, and it aims to serve as a learning opportunity for hazardous waste generators in Vermont. Anyone interested in attending will need to [Register Online](#).

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During the webinar, speakers from the Program will discuss changes to the VHWMR that came into effect in February of 2022 with a particular focus on hazardous waste identification; generator category determination; management standards for generator categories; and alternative management standards associated with conditional exemptions, episodic events, and universal waste. If you are a hazardous waste generator in Vermont, a hazardous waste handler, or are simply interested in learning more about the VHWMR, you are encouraged to attend the webinar. If you are unable to attend the scheduled event, please note that we will post the presentation slides and recording online.

If you did not receive our previous announcement via email and you would like to be added to the hazardous waste distribution list, or if you have questions about the upcoming webinar, please refer to the contact information at the end of the newsletter. The Program looks forward to having you join the webinar!

Got Labels?

Effective hazardous waste management, according to the VHWMR, requires generators to accurately identify their waste streams and determine whether they are

generating hazardous waste. Without an accessible, legible, and accurate label, handlers and first responders cannot reasonably expect to know what a container holds, how long its contents have been accumulating or in storage, or what risks those contents may pose to the

handler, public health, and the environment. Knowing what needs to be on a container label, then, is a critical component of hazardous waste management.

Like many of the requirements of the VHWMR, a generator's responsibilities for labelling containers depends on their generator category: very small quantity generator (VSQG), small quantity generator (SQG), or large quantity generator (LQG). VSQGs have a minimum requirement to mark containers with the words "Hazardous Waste" and other words that identify the contents.

SQGs and LQGs, on the other hand, must meet more stringent requirements when it comes to container labelling. For *satellite accumulation*, SQGs and LQGs must label containers with the words "Hazardous Waste" and include an indication of the hazards of the contents. To meet the latter requirement, a characteristic hazardous waste, for instance, could be labelled with a placard signifying its applicable characteristic (i.e., ignitable, corrosive, reactive, toxic) as an indication of the hazards of the contents. Once satellite containers become full or reach the regulatory limit for accumulation, they must be dated. For *accumulation in short-term storage areas (STSAs)* (i.e., the generator brings hazardous waste directly from the point of generation to the STSA after each 12-hour shift), SQGs and LQGs must label containers with the words "Hazardous Waste" and an indication of the contents of the container. Containers must be marked with the date when they become full or are no longer being used for accumulation. These containers must also be marked to indicate that they are "accumulation containers" and describe the point of generation.

"For short-term storage in STSAs, containers must be marked or labeled as soon as the first drop of hazardous waste is added."



On the drum above, note the clear indication of the hazard ("flammable"), date, and words "Hazardous Waste." This would be appropriate for storage in an STSA.

For *short-term storage* in STSAs, containers must be marked or labeled as soon as the first drop of hazardous waste is added. Containers in STSAs must also be marked with the words "Hazardous Waste" and include an indication of the hazards of the contents. They must also include the date upon which the period of short-term storage begins, except for accumulation containers managed in STSAs, as referred to above.

School's Out for Summer

With the typical academic calendar in its annual lull, facility managers across the state are implementing maintenance activities on school grounds. In many cases, this involves generating hazardous waste through cleaning, painting, replacing light fixtures, and handling old supplies. Common locations associated with hazardous waste on school property include science laboratories, art classrooms, woodshops, custodial closets, maintenance sheds, and garages. Like any other hazardous waste generator, the VHWMR require schools that generate hazardous waste to notify the Hazardous

Waste Program using **EPA Form 8700-12** and receive an EPA ID number for their site.

Vermont's Waste Management and Prevention Division (WMPD) occasionally receives questions from school personnel about the proper management of old chemicals and supplies found in science, art, and woodworking classrooms. The following are several tips for schools to keep in mind when dealing with these chemicals, no matter the time of year:

- Exercise caution when dealing with materials that may be hazardous, and note that materials that may not normally be associated with hazards may still pose risks. Oil paints, pottery glaze, metal etching liquids, and chemicals for photography development may meet hazardous waste criteria. Start by reading labels and/or safety data sheets making note of words like, "caution, toxic, danger, hazard, warning, poisonous, reactive, corrosive, flammable."
- If container contents are unknown, have trained individuals (e.g., school chemistry teachers or environmental health and safety professionals) identify their contents and properly label them.
- Keep old laboratory chemicals in their original container whenever possible.
- Note any containers with liquid contents that show evidence of crystallization may be indicative of reactive contents and will require special precautions. For example, picric acid, which can be used as a dye in chemistry experiments, becomes explosive as it dries with age.
- If school staff transport hazardous waste to an off-site facility, the waste should be packed in a way that will prevent spilling. Note that only VSQGs can self-transport in Vermont.
- For assistance with proper disposal of hazardous waste, schools should contact their local [Solid Waste Management Entity](#).



Oil paints, like those pictured above, may meet hazardous waste criteria and require management according to the VHWMR.

Vermont's Hazardous Waste and Solid Waste Programs are also available to answer questions. The webpage dedicated to [Hazardous Waste Management for Schools](#) offers written resources, instructional videos, and examples of chemical inventories for classroom chemicals, floor cleaners, strippers, fluorescent lamps, paint, and the like. [Project Worksafe](#) may be able to provide assistance with developing a chemical hygiene plan for all chemicals used at a given school. Opportunities for grants and scholarships to assist schools with clean out and disposal costs may also be found through the [Vermont School Boards Insurance Trust \(VSBIT\)](#).

Waste Aerosol Cans

According to the VHWMR, an aerosol can is defined as a non-refillable receptacle containing a gas compressed, liquefied, or dissolved under pressure, the sole purpose of which is to expel a liquid, paste, or powder and fitted with a self-closing release device allowing the contents to be ejected by the gas. Common aerosols include spray paints, solvents, and lubricants.

Handlers should note that with the revised regulations now in effect, waste aerosol cans may now be managed per the streamlined standards for universal waste that

are outlined in [Subchapter 9](#) of the VHWMR. Universal wastes pose a low risk to the environment and public health as compared to other hazardous waste, and they are also generated by a wide variety of businesses across generator categories. Therefore, rather than manage this type of waste according to the requirements of Subchapters 1 through 7, generators may opt to manage it under the waste-specific management standards of Subchapter 9.



Before managing waste aerosol cans per Subchapter 9, though, generators should first determine whether the cans are empty. If so, they are exempt from regulation as hazardous waste and may be recycled as scrap metal or disposed of in the trash. Making this determination may help generators avoid overmanaging their waste.

If waste aerosol cans are not empty, and they are determined to meet the criteria for hazardous waste, generators may refer to the management standards found in Section 7-912(d)(9). The following is a summary of management standards, but please consult the VHWMR for exact regulatory language:

- They must be accumulated in a container that is structurally sound, compatible with the contents of the aerosol cans, lacks evidence of leakage or damage, and is protected from sources of heat.
- As long as each aerosol can is not breached, the following activities are allowable: sorting aerosol cans by type, mixing intact cans in one container, removing actuators to reduce the risk of release.
- If they show evidence of leakage, they must be packaged in a separate closed container, overpacked with absorbents, or immediately punctured and drained in accordance with the requirements of Section 7-912(d)(9)(D). Note that puncturing and draining must be done using a device designed to safely puncture aerosol cans and effectively contain the residual contents and any emissions.

“If waste aerosol cans are not empty, and they are determined to meet the criteria for hazardous waste, generators may refer to the management standards found in Section 7-912(d)(9).”

Please contact the Program if you have questions about the requirements of the VHWMR as they relate to waste aerosol cans or universal waste more broadly.

New Guidance Resources

Following the changes to the VHWMR that came into effect earlier this year, the Program is working to update the [Resources for Hazardous Waste Handlers](#) webpage with guidebooks, fact sheets, and other information that is consistent with the current regulations. There are many regulatory areas to be covered, and you can expect the webpage to continue to receive updates for the foreseeable future. The following are the resources that have been posted online since the first issue of the Newsletter was distributed in May:



GUIDEBOOKS

VSQG Guidebook: replaces the Conditionally Exempt Generator Handbook and provides a general overview of the hazardous waste management requirements that apply to “Very Small Quantity Generators” (VSQGs).



FACT SHEETS

Pharmaceuticals: intended to give guidance to healthcare facilities in Vermont that have questions regarding the management of hazardous waste pharmaceuticals.

Spill Response (Hazardous Materials): summarizes the spill response and notification requirements included in the Vermont Hazardous Waste Management Regulations (VHWMR) and the Investigation and Remediation of Contaminated Properties Rule and describes response procedures for releases of hazardous materials.

Universal Waste: focuses primarily on the universal waste management requirements for small quantity handlers of universal waste.

Used Oil: explains the definition of used oil and summarizes what is allowable regarding used oil management, usage, storage, and transport.

Used Oil Burning: summarizes the requirements applicable to burning “specification” used oil fuel in “small fuel burning equipment” (i.e., equipment that has been designed specifically for burning used oil fuel), an activity that is exempt from Vermont’s Air Pollution Control Regulations (APCR).

FOR MORE INFORMATION PLEASE CONTACT:

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