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SPILL NOTIFICATIONS

Local:	State:	Federal:
<ul style="list-style-type: none"> • Discuss with your local environmental emergency response, hazardous materials team, and Local Emergency Planning Commission (LEPC) 	<ul style="list-style-type: none"> • State Watch Office 1-800-320-0519 • Petroleum spills greater than 25 gallons (pervious); 40 gallons (impervious) • Spills impacting waterways • Hazardous waste spills • Spills exceeding RQ 	<ul style="list-style-type: none"> • National Response Center 1-800-424-8802 • Spills exceeding RQ • Spills impacting navigable waterways

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WHEN ROUTINE BECOMES EMERGENCY

- A thorough inspection of a hazardous waste generator can identify:
 - Areas of concern that have caused environmental harm
 - Ongoing pollution
 - Imminent harm conditions
 - Incomplete records

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AT A GLANCE

- There may be evidence of improper disposal that you can identify during a routine hazardous waste inspection.
 - Staining on asphalt/concrete
 - Decaying or stained vegetation
 - Hoses or pipes leading away from process areas
- Remember, you direct the inspection!

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RECORDS



- Reconcile records that the volume/consumption that is evident from the business is reflected in disposal
 - Has there been a change to process that would explain a drop-off? (Waste reduction)
 - Has the business slowed?
 - Does the business have routine shut-downs?

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CASE STUDY



Facility registers as LQG

Manufacturing - gluing and sealing seams of poly fabric

Waste codes: D001 (ignitable), D035 (methyl ethyl ketone), F003 (spent non-halogenated solvents: acetone), F005 (spent non-halogenated solvents: toluene and methyl ethyl ketone)

No facility shut-down, change in process (waste reduction)

Inspection 7/2024

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6/6/2023
 Sales Rep:

Qty	Description	Price	Unit
1	Flammable Liquid, Thin Pumpable, <10% water, <1% Chlorides, >9000 BTU- UR5208 Adhesive	\$200.00	per 55g Drum
2	Flammable Liquid, Thin Pumpable, <10% water, <1% Chlorides, >9000 BTU- MEK	\$200.00	per 55g Drum
4	MEK/Adhesive contaminated rags, No Free Liquids	\$125.00	per 55g Drum
1	E-Manifest Fee	\$35.00	Each
1	Transportation Stop Charge	\$250.00	per Stop
Price includes Transportation, Disposal, Profiles, Manifests, and Labels			
Estimated Total		\$1,385.00	

*Prices are valid for 30 days from service agreement date. Prices pending waste profile acceptance. Prices based on volume.
E-Manifest: E-manifest fees will apply, totalling no more than \$35.00 per manifest.
Containers and Labeling: Containers must be free of residue. Dented, leaking, bulging, damaged, unlabeled containers are not allowed to ship. Please make sure drums and totes are sealed and labeled and in their upright position; rings, bung caps and lids are tight before trucks arrive to avoid demurrage charges. Pallet prices are based on a weight of 2000 lbs per pallet. Pallets of smaller containers or boxes cannot be stacked higher than 4 feet. No more than (30) 5-gallon pails can be stacked on a pallet. Transportation charges are based on drum spaces on the truck.
Loading: You have the industry standard of 1 hour free loading. After the first hour, the cost will be \$145.00 per hour unless otherwise specified. If the generator's material ships on a Bill of Lading and the generator fails to give the transporter the Bill of Lading provided by Clean Management at the time of pickup, the generator will be responsible for any additional transportation charges. If a pickup is canceled by the generator less than 48 hours before the pickup date, the generator will be responsible for a "no load fee" of a minimum of \$500.00.
Off-spec: Off-spec material, water, additional chemicals and unspecified solids, extra heavy material, "not profiled" are subject to additional cost. Please review your profile. All state waste taxes will apply. Applicable fuel surcharges will apply based on the current D.O.E. rates at the time of pickup.
Terms: Our terms are NET 15 from invoice date, pending credit approval. A 3% convenience fee will be applied to all credit card payments. An interest charge of 1 1/2 percent will be due on all bills more than fifteen (15) days old. Customer agrees to pay all costs of collection, including reasonable attorney fees, in the event that a suit is necessary to collect a fee due.
Please fill out and sign below:
 Loading dock available: yes no P.O. Number: _____
 Forklift available: yes no Emergency Contact: _____
 18 wheeler access: yes no Emergency Phone #: _____
 Shipping hours: _____
 Authorized Signature/Title: _____ Date: _____

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INVOICE

DEAL #	DATE	INVOICE NO.
67707	7/14/2023	84067

P.O. NO.	TERMS	LOCATION	
	COD	JACKSONVILLE, FL	
DESCRIPTION	QTY	RATE	AMOUNT
FLAMMABLE LIQUID ADHESIVES	2	225.00	450.00
FLAMMABLE LIQUID ADHESIVES, OFFSPEC: NON-PROCESSABLE SOLIDS	2	125.00	250.00
TRANSPORTATION	1	350.00	350.00
PAYMENT PROCESSING FEE	0.03	1,050.00	31.50
ANY ADDITIONAL SURCHARGES WILL BE INVOICED SEPARATELY			0.00

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	Invoice Date 12/11/2023	Invoice # 23-2679			
	Job Location:				
PLEASE PAY					
THIS AMOUNT		By or Before 1/10/2024			
Billing Inquiries? Call 1-877-222-2381 Ask for the Accounting Department					
	Terms Net 30	Pick up date 2023/12/08	Manifest #		
Profile #	Description	Qty	Rate	Unit	Amount
2300026031-1	HAZARDOUS WASTE TOLUENE, MEK AND ADHESIVE LIQUIDS (<10% WATER) FA1030, UR5208	5	175.00	DRUM	875.00
MANIFEST F...	EPA MANDATORY HAZARDOUS MANIFEST FEE TO CLEAN EARTH	1	25.00	MANIFE ST	25.00
PICK UP	PICK UP/STOP CHARGE	1	85.00	SHIPME NT	85.00
FUEL SURC...	FUEL SURCHARGE PER DRUM	5	22.75	DRUM	113.75
This Invoice reflects your material as per manifest and signed Agreement. If your material, once processed is NOT as profiled or off-spec, you will receive an additional invoice for the surcharges.					

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	PLEASE PAY				
	THIS AMOUNT	By or Before 3/11/2024			
Billing Inquiries? Call 1-877-222-2381 Ask for the Accounting Department					
	Terms Due on receipt	Pick up date 2024/02/16	Manifest # 016640862FLE		
Profile #	Description	Qty	Rate	Unit	Amount
2300026031-1	HAZARDOUS WASTE TOLUENE, MEK AND ADHESIVE LIQUIDS (<10% WATER) FA1030, UR5208	6	175.00	DM	1,050.00
2300026031-1	HAZARDOUS WASTE TOLUENE, MEK AND ADHESIVE LIQUIDS (<10-50% SLUDGE) FA1030, UR5208	6	310.00	DM	1,860.00
MANIFEST F...	EPA MANDATORY HAZARDOUS MANIFEST FEE TO CLEAN EARTH	1	25.00	MANIFE ST	25.00
PICK UP	PICK UP/STOP CHARGE	1	85.00	SHIPME NT	85.00
FUEL SURC...	FUEL SURCHARGE PER DRUM	12	22.75	DM	273.00
This Invoice reflects your material as per manifest and signed Agreement. If your material, once processed is NOT as profiled or off-spec, you will receive an additional invoice for the surcharges.					
Any balance after due date will be subject to a service charge of 1 1/2% per month; 18% annually. Customer agrees to pay all cost of collection, including reasonable attorney fees, in the event litigation is necessary to collect past due amount. There will be a \$50 charge for all returned checks.					Total \$3,293.00
					Payments/Credits \$0.00
					Balance Due \$3,293.00

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VISUAL INSPECTION

- Evidence of environmental harm
 - Staining on asphalt/concrete
 - Decaying or stained vegetation
 - Hoses or pipes leading away from process areas

- Remember, you direct the inspection!

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CASE STUDY – VEHICLE MAINTENANCE

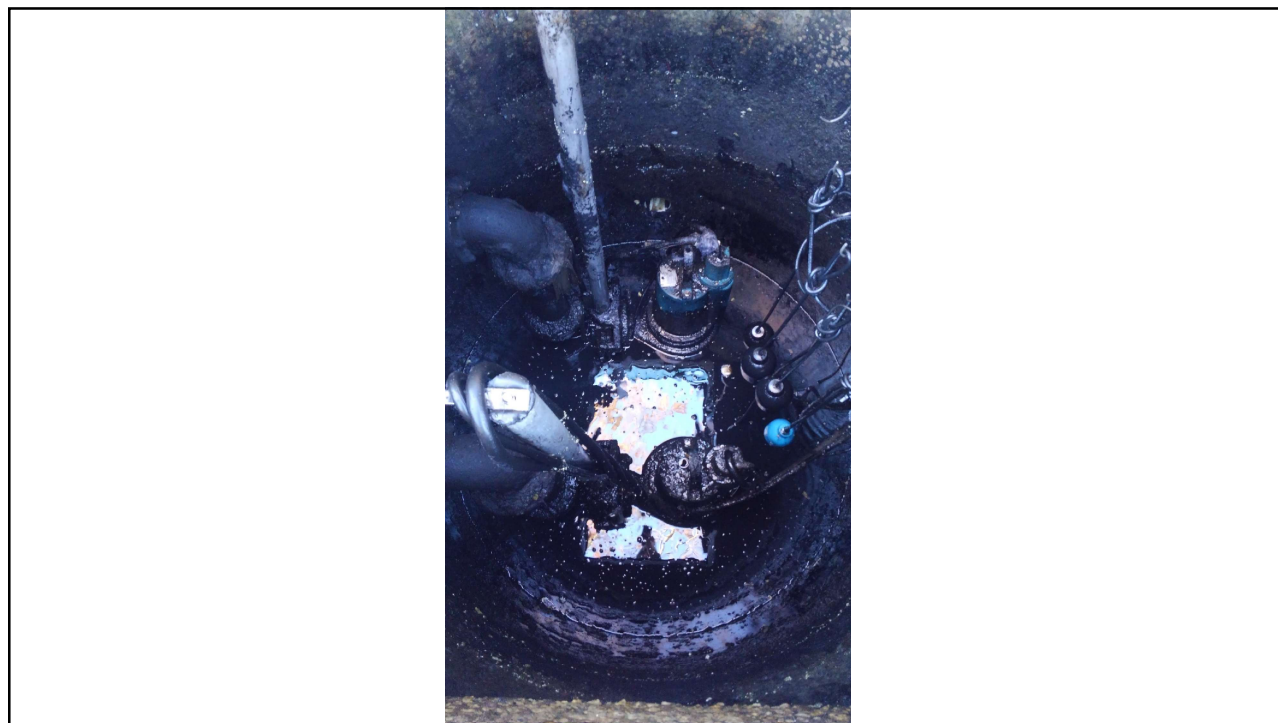


- Floor drains are stained with petroleum from improper housekeeping
- Where do the floor drains go?
- Is oil-water separator working properly?

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CASE STUDY – POWDER COATING



- Striping material is found in the workshop
- There are no disposal records or accumulation areas
- Is this a new process? Product change?

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CASE STUDY – FENCE/METAL COATING



- Applying primer to raw metal.
- Some acid stripping is performed on metal.
- How is their housekeeping?
- Is the business over multiple properties?

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Section 3. Composition/information on ingredients

Substance/mixture : Mixture
 Other means of identification : Not available.

CAS number/other identifiers

Ingredient name	% by weight	CAS number
Calcium Carbonate	48	1317-65-3
Titanium Dioxide	4-10	13463-67-7
Talc	9-10	14807-96-6
Lt. Aliphatic Hydrocarbon Solvent	18-20	64742-89-8
Carbon Black	.05-1.0	13333-86-4
Red Iron Oxide	4-5	1309-37-1
Quartz	0.2	14808-60-7

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

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Section 8. Exposure controls/personal protection

Eye/face protection : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: chemical splash goggles.

Skin protection

Hand protection : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.

Body protection : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product. When there is a risk of ignition from static electricity, wear anti-static protective clothing. For the greatest protection from static discharges, clothing should include anti-static overalls, boots and gloves.

Other skin protection : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Respiratory protection : Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.

Section 9. Physical and chemical properties

Appearance

Physical state : Liquid.

Color : Varies.

Odor : Mild aliphatic.

Odor threshold : Not available.

pH : Not available.

Melting point : Not available.

Boiling point : 115°C (230°F).

Flash point : Closed cup: 10°C (50°F) [Pensky-Martens Closed Cup]

Flammability (solid, gas) : Not available.

Lower and upper explosive (flammable) limits : Lower: 0.9%
Upper: 10.6%

Vapor pressure : 0.21 kPa (1.599 mm Hg) [at 20°C]

Vapor density : 3.66 [Air = 1]

Relative density : 1.5

Solubility : Not available.

Partition coefficient: n-octanol/water : Not available.

Auto-ignition temperature : Not available.

Decomposition temperature : Not available.

Viscosity : 65 -70 Krebs units

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CASE STUDY – POWDER COATING (AGAIN?)

- Containers of virgin product are visible in the workshop
- Striping is described as part of the powder coating process
- No disposal records, despite operating for 2 years in this location
- Numerous employees and projects onsite so there are they consuming enough to have waste?

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Safety Data Sheet

Section 1, Identification

Product Identifier:	B17 Industrial Paint Remover
Synonyms:	B17
CAS No.:	None - mixture
Manufacture Stock	B17
Number:	
Intended Use:	Paint and Finish Removal
Manufacturer:	Benco Sales, Inc. 123 Stout Drive Crossville, TN 38555 931-484-9578
Emergency Phone:	800-535-5053 INFOTRAC
Information Phone:	931-484-9578
Fax:	931-484-7614

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Hazards not Otherwise Classified: None

Section 3, Composition/Information on Ingredients

CAS No.	Ingredient Name	PEL(OSHA)	TWA (OSHA)	Weight Percentage
75-09-2	Dichloromethane	25 ppm	25 ppm	55-65
108-95-2	Phenol	5 ppm	5 ppm	12-20
64-18-6	Formic Acid	5 ppm	5 ppm	12-20
7664-39-3	Hydrofluoric Acid	3 ppm	3 ppm	1-5

Occupational exposure limits, if available, are listed in section 8

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Section 9, Physical and Chemical Properties

Physical State: Liquid

Appearance: Light in color

Odor: Typical Methylene Chloride and Acid odor

pH: 10-12

Boiling Point: 104F (Initial)

Density: 10 lbs. / gallon

Vapor Density: 2.93 (Air = 1)

Specific Gravity: 1.195

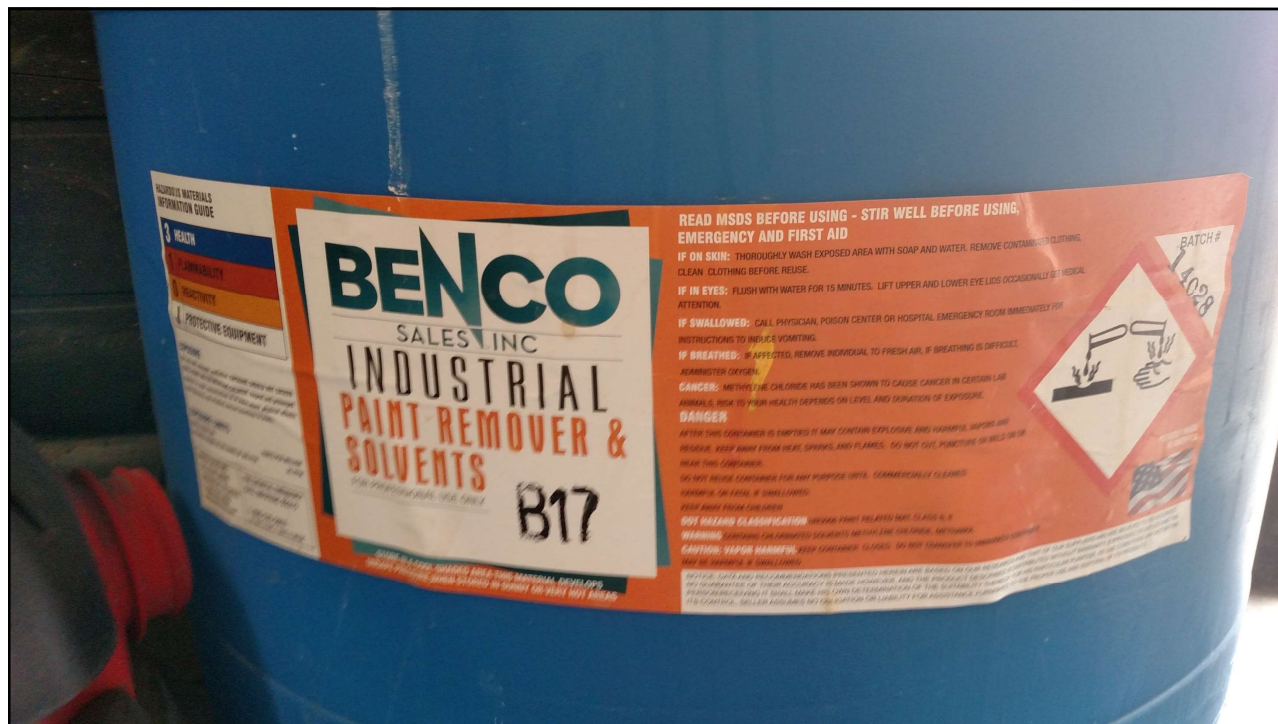
Percent Volatile: >95.0%

VOC Emission Content: 176 grams/liter

Flash Point: None

Auto-ignition Temperature: Not Determined

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IRON-FIXING BACTERIA

Don't be tricked by the rainbow sheen!

When iron bacteria (*Sphaerotilus-Leptothrix*) "eat" iron in water, they deposit iron-oxide.

This may appear rust colored, create a sheen on water, or stain concrete.

This is naturally occurring and does not cause environmental harm.

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SIGNS OF PETROLEUM OR IRON-FIXING

Petroleum:

- Distinct odor
- Consistent rainbow sheen
- Pockets of free product

Iron-fixing:

- Sheen breaks apart
- Stagnant odor
- No free product
- Orange, fuzzy deposits

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