

Fond du Lac Ojibwe School
Environmental Standard Operating
Procedures



SY 2023-2024

SPENT ANTIFREEZE

Purpose

Antifreeze is commonly made up of ethylene glycol, propylene glycol, or another chemical that will transfer heat from a vehicle's engine to its radiator. During this process, antifreeze may become contaminated with traces of fuel, metal particles, and grit. Antifreeze also breaks down over time — forming acids that corrode the cooling system.

Unusable antifreeze that is removed from a motor or vehicle is considered a waste. Drained antifreeze that can be reused without any processing is not considered a waste. To do so, use a clean or dedicated drain pan to catch antifreeze — you may be able to put it directly back into the vehicle.

Responsibilities for all facility staff

1. Store spent antifreeze in a closed container labeled "Waste antifreeze – To be disposed."
2. If necessary, transport the closed container to Transportation Bldg. and dispose of in a 55-gallon drum labeled "Waste antifreeze – To be disposed."
3. Complete the Waste Generation Log.
4. Contact Andrea Junker/Environmental Health Specialist/Ext. 7111 for assistance.

What if . . .

I have just a little bit of spent antifreeze; can't it be mixed with used oil?

No. Since spent antifreeze may have become contaminated with traces of fuel, metal particles, and grit from the engine, it may be hazardous and would therefore contaminate the entire amount of used oil (or any other material) that it is mixed with, making the entire mixture hazardous waste.

What happens if my radiator fails, spilling all my antifreeze on the ground?

Attempt to clean-up the spill with absorbents or use other measures to clean it up. Since the antifreeze may be hazardous (see above), dispose of absorbents as hazardous waste (see Hazardous Waste SOP).

Effective Date: 7/1/09	Review Date: 8/1/23
Contact: Maria Defoe 218-878-7259	

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Additional Responsibilities

Point of Contact for spent antifreeze disposal:

- Arrange for disposal.
- Inspect storage area at least quarterly.
- Maintain generator log with each 55-gallon drum.
- Submit generator logs and disposal receipts to HAZMAT Program Contacts quarterly.

Spent Antifreeze: Contact

**Transportation Supervisor
878-8009**

**Facilities Operations and
Maintenance Supervisor
878-7234**

HAZMAT Program Contacts

- Inspect all storage areas at least quarterly.
- Conduct and maintain documentation of one-time testing on spent antifreeze to establish hazardous waste applicability.
- Maintain facility-wide generator log for three (3) years.

HAZMAT Program Contacts

Maria Defoe: 878-7259

Michael Quam: 878-8009

Andrea Junker 878-7111

DRY-CELL BATTERIES

Including alkaline, carbon zinc, nickel-cadmium, nickel metal hydride, sealed lead-acid, mercury or mercuric oxide, silver or silver oxide, lithium ion, lithium, and zinc air.

Purpose

Some batteries are hazardous to the environment because of the amount of mercury, lead, cadmium, or silver they contain; others are not hazardous because they do not contain any of these toxic metals, or they contain such tiny amounts that they do not pose a significant environmental concern. Some batteries are single use, while others are rechargeable and can be used many times; some batteries can be recycled, some cannot.

Responsibilities for all staff

1. Determine whether or not the used battery(ies) is considered hazardous.
2. If the used battery is considered hazardous or recyclable, label it "Batteries for Recycling" and with the date.
3. Send or deliver to Wayde Hietala/O&M Supervisor: 878-7234
4. If the used battery is not considered hazardous or is non-recyclable, dispose of in regular solid waste.
5. Contact Andrea Junker/Environmental Health Specialist/878-7111 for any assistance.

What if . . .

The battery is not marked as to what type it is?

To be on the safe side, send it to Maintenance Dept.

The battery is damaged?

If the battery appears to be leaking, bag it and contact Maintenance Dept. for a pick-up.

Used Battery Contact
Facilities O&M Supervisor 878-7234
Transportation Supervisor: 878-8009

Effective Date: 7/1/09

Review Date: 8/1/23

Contact: Maria Defoe 218-878-7259

Additional Responsibilities

HAZMAT Program Contact

- Arrange for battery pick-up or drop-off with an outside vendor.
- Maintain log of quantities shipped off site.
- Ensure all batteries are labeled according to the SOP.
- Maintain facility-wide shipping records for three (3) years.
- Maintain transporter name, phone number, permit number, and recycling method, and/or disposal facility name, phone number, permit, and recycling method.
- Maintain a log to assure less than 5000 kg of batteries, fluorescent lamps, and pesticides are generated each year.

**HAZMAT Program Contact
Environmental Health Specialist
878-7111**

Clean Up of Broken Fluorescent Lamp(s) and Disposal of Hazardous Waste

40 CFR 261.24 & 273.9; 40 CFR 261.5; 262-266; 268; 270; 124; & 40 CFR 273

Purpose: To provide a standard operating procedure for cleanup of a broke fluorescent lamp. Waste Fluorescent lamps, including **Green Tips**, are determined to be hazardous and banned from solid waste disposal because of the toxic chemical – mercury. A broken fluorescent lamp releases Mercury as mercury vapor. The broken lamp continues to release mercury vapor until it is cleaned up and contained.

(2 Tablespoons of mercury = 1 pound. The average 4-foot lamp contains about 8 milligrams of mercury)

Clean-Up and Disposal Overview

Important steps to reduce exposure to mercury vapor are:

1) Before Cleanup

- Have people and pets leave the room!
- Air out the room for fifteen minutes by opening a window or door to the outdoor environment
- Shut off the central heating/air conditioning system
- Collect materials needed to clean up the broken lamp

2) During Cleanup

- Be thorough in collecting broken glass and visible powder
- Place clean-up materials in a structurally-sound, closed container (e.g., plastic bag)

3) After Cleanup

- Promptly place all lamp debris in a protected area until materials can be disposed of
- If practical, continue to air out the room where the lamp was broken and leave the heating/air conditioning unit off for several hours

BEFORE CLEANUP

Collect materials you need to clean up the broken lamp

- Stiff paper or cardboard
- Sticky tape (e.g., duct tape)
- Damp paper towels or disposal wet wipes (for hard surfaces)
- *Sealable container (e.g., plastic bags)
- Shipping box used for Fluorescent lamp disposal / recycling, labeled as Hazardous waste with date of breakage

CLEANUP

Cleanup on Hard Surfaces

- Carefully scoop up glass fragments and powder using stiff paper or cardboard and place debris and paper /cardboard in the container (plastic bag¹)

Initial SOP Date: 9/13/2011	Contact: Maria Defoe 218-878-7259
Updated: 8/1/23	SOP Basis: 40 CFR 273 for Universal Waste Management

¹ A plastic bag will not prevent mercury vapor from escaping, you may want to remove the plastic bag(s) from the room to a secure location – and place in a structurally sound, closed container, within the labeled/dated shipping box after cleanup.

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- Use sticky tape to pick up any remaining glass and powder, and place in the container
- Wipe the area clean with a damp paper towel or disposable wet wipes. Place used towels / wipes in a container
- Promptly place container in the labeled/dated disposal box and remove to a secured well-ventilated area
- Check with your state/Tribal government about disposal requirements in your area. Some allow broken fluorescent lamps to be taken to a local recycling center
- Wash your hands with soap and water after placing debris in a secure location
- Continue to air out the room where the lamp was broken and leave the heating/air conditioning off as practical, for several hours

On Carpeting or Rugs

- Carefully scoop up glass fragments and powder using stiff paper or cardboard and place debris in a sealable plastic bag
- Use sticky tape to pick up any remaining glass fragments and powder. Place in sealable container
- If broken glass remains after using sticky tape and vacuuming is needed to ensure removal:
 1. Keep a window or door to the outdoors open
 2. Vacuum the area where the lamp was broken using the vacuum hose
 3. Remove the vacuum bag or empty and wipe the canister) and seal the bag/vacuum debris and any materials used to clean the vacuum in a sealable plastic bag
- Promptly place container in the labeled/dated disposal box and remove to the designated disposal storage area
- Check with your state/Tribal government about disposal requirements in your area. Some allow broken fluorescent lamps to be taken to a local recycling center.
- Wash your hands with soap and water after placing debris in a secure location
- Continue to air out the room where the lamp was broken and leave the heating/air conditioning off as practical, for several hours

Future Cleaning of Carpeting or Rugs: Air out the Room During and After Vacuuming

- The next several times you vacuum the rug or carpet, shut off the heating/air conditioning, close the doors to other rooms, and open a window or door to the outside before vacuuming. Change the vacuum bag after each use in this area.
- After vacuuming is complete, keep the heating/air conditioning off and the window or door to the outside open, as practical, for several hours

Actions you Can Take to Prevent Broken Fluorescent Lamps

Fluorescent lamps are made of glass and can break if dropped or roughly handled. To avoid breaking:

- When replacing a fluorescent lamp, always switch off the light and allow the lamp to cool before handling
- Always handle lamps carefully to avoid breakage
- Consider not using light fixtures that can be easily knocked over
- Use plastic coverings over the fluorescent lamps
- Consider using a drop cloth (e.g., plastic sheet, beach towel) when changing fluorescent lamps which can be bundled with the debris for disposal

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Contact Information

Point of Contact: Facilities O&M Supervisor (218) 878-7234

Responsibilities:

- Inspect storage area at least quarterly for:
 - Labeled and dated boxes containing sealed bags of broken fluorescent lamps
 - Ensure Universal waste (Fluorescent Tubes) are properly disposed of at a certified facility
 - Ship out boxes containing broken lamps with a recycler if they accept the waste, or manage according to full hazardous waste regulations
 - Maintain shipping records/manifests for 9 years
 - Maintain log to verify that less than 1,000 kg (2,204 lbs) of hazardous waste are generated each year for Universal Waste requirements
 - Maintain facility-wide generator log for 9 years

Training Log *(Attach additional sheets as needed to verify staff training)*

I have been trained on this SOP:

<u>Date</u>	<u>Employee</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

HAZMAT Program Contacts
Grants & Accountability Manager: 878-7259
Facilities O&M Supervisor 878-7234
Transportation Supervisor: 878-8009
Fond du Lac Environmental Health Specialist 878-7111

Compressed Gas/Aerosol /Paint Cans

Including pesticides, paint, solvents, oils, propane, butane, oxygen, acetylene, and other compressed gas cylinders.

Purpose

Compressed gas products, such as paints, solvents, pesticides, and acetylene; waste aerosol; and paint products may be hazardous. The hazard characteristic is a result of the highly flammable propellants such as propane and butane for compressed gases and aerosols, and solvent content for paint products. Some paint residues left in cans may also exhibit flammable hazardous waste characteristics. The combination of these characteristics requires these wastes to be handled as hazardous waste.

Responsibilities for all staff

Compressed Gas Cylinders

1. Contact the company where the cylinder originated and arrange for delivery for disposal.
2. If the cylinder does not have company markings, whether it is full or empty, manage it as a hazardous waste and follow Hazardous Waste SOP.
3. If the cylinder is empty (i.e., equals atmospheric pressure), is made entirely of metal, and has no residual chemicals, attempt to recycle as scrap metal. Refer to Scrap Metal SOP.

Aerosol Cans

1. If it is certain that an aerosol can is empty (i.e., no remaining liquid and propellant), the can may be recycled as scrap metal.
2. Non-empty aerosols must be managed as a hazardous waste. Refer to Hazardous Waste SOP. (Aerosols are hazardous because they are ignitable (D001) due to the type of propellants used.)

Paint Cans

1. Regardless of paint type (i.e., oil or latex), use up all paint in paint can. Methods could include adding coats to the job or painting insides of trashcans.
2. As long as no product remains (i.e., less than 10 percent of original volume or less than one inch in the bottom of can), the can may be set to dry.
3. Recycle empty paint cans as scrap metal. Refer to Scrap Metal SOP.
4. For abandoned paint, refer to Hazardous Waste SOP.

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Review Date 8/1/23

Contact: Maria Defoe 218-878-7259

Fond du Lac Ojibwe School Standard Operating Procedure

What if . . .

I'm not positive that my aerosol can (or compressed gas cylinder) is completely empty?

If there's any doubt that your container is empty, assume that it is not and manage it as hazardous waste. Refer to the Hazardous Waste SOP.

I have an old cylinder I don't know what's in it, or where it came from. Can I throw it out?

No. Since the contents are an unknown, then it should be managed as hazardous waste. Some companies may take it, so try to contact those that work with you. Otherwise, refer to the Hazardous Waste SOP.

I let my latex paint cans air out, even though they're full, since they're not hazardous?

Latex paint may be considered hazardous due to the slight amount of solvent in it. If you air out your container and the latex paint is considered hazardous, that is considered 'treatment of hazardous waste' which the facility is not permitted to do without a hazardous waste treatment permit. Instead, use up all paints prior to disposal of the container.

I paint cardboard and throw it out after it dries to get rid of paint?

Painting the cardboard with the intent of throwing it out is considered 'treatment of hazardous waste,' which the facility is not permitted to do without a hazardous waste treatment permit. Instead, use up all paints prior to disposal of container.

Lead paint chips are produced during a job?

These paint chips may be considered hazardous waste and need to be tested. Contact Maintenance Dept. (x7234) to arrange for the waste to be tested. Until that is set up, manage the chips hazardous waste. Refer to the Hazardous Waste SOP.

Compressed Gas/Aerosol/Paint Contact

Facilities O&M Supervisor: 878-7234
Transportation Supervisor: 878-8009

I have leftover materials (e.g., paint brushes)?

Clean brushes (e.g., oil-based used) and other equipment using paint thinner. Use that thinner until it passes its useful life. Dispose of thinner as hazardous waste. Refer to Hazardous Waste SOP. For latex-used material, clean in utility sink.

HAZMAT Program Contacts

Facilities O&M Supervisor: 878-7234
Transportation Supervisor: 878-8009
Fond du Lac Environmental
Health Specialist: 878-7111

Additional Responsibilities

HAZMAT Program Contacts

- Ensure that all waste paint is managed as hazardous waste. Encourage using all paint products to avoid disposal costs. Contact receiving wastewater treatment plant to ensure facility can manage latex paint wash water.
- Inspect storage areas, both scrap metal and hazardous waste, to ensure proper segregation of paint products and recyclables.
- Maintain records of waste disposal.

Scrap Electronic Equipment

Including computers and monitors, televisions, photocopiers, fax machines, video monitors and equipment, telephones, cordless rechargeable appliances, and audio equipment.

Purpose

Electronic equipment and appliances may contain significant quantities of hazardous materials such as lead, mercury, cadmium, and polychlorinated biphenyls (PCBs). If mismanaged, these materials can be harmful to human health and the environment. These materials may be found in batteries, cathode ray tubes, printed wire boards, switches, relays, position sensors, capacitors, transformers, and the chassis of the equipment. The cathode ray tubes found in computer monitors and televisions may contain more than five pounds of lead.

Responsibilities for all staff

1. Once you determine that the equipment is no longer to be used, contact Maintenance/x7234 to arrange for a drop-off.
2. Transport the waste in a secure fashion to avoid breakage to Maintenance Department/x7234.
3. Store the waste at the designated location inside Custodial Department/7234. Small devices and individual components, such as printed wire boards and cathode ray tubes, should be stored in a container that is able to contain the waste at all times.
4. Mark products or containers with a short description "Used ____ for Recycling" or "Waste ____ for Recycling" and the date it became a waste.
5. Complete Waste Generator Log.

What if . . .

I disassemble the equipment to get some components out?

The facility is prohibited from disassembling the equipment for disposal purposes. Disassembling the equipment may be interpreted as 'treatment of hazardous waste' due to potential presence of mercury, PCBs, and other hazardous materials.

The equipment is damaged?

Even if the equipment is damaged (e.g., T.V. monitor), you should still follow the procedures above. Hazardous materials may still be removed by the recyclers. If the equipment may have PCBs and appears to be leaking, contact the HAZMAT Program Contacts.

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Review Date: 8/1/23

Contact: Maria Defoe 218-878-7259

Additional Responsibilities

Point of Contact for scrap electronic equipment.

- Ensure that all contents received are labeled according to the SOP.
- Ensure that the generator log is complete.
- Weekly inspect the scrap electronic equipment storage area.
- Contact Maintenance Dept. or MIS Division (x3727) to arrange a pickup of the scrap electronic equipment if storage area is approaching full.

Scrap Electronic Equipment Contact
Facilities O&M Supervisor: 878-7234
IT Division: 878-3727

HAZMAT Program Contacts

- Arrange for ultimate recycling/disposal of scrap electronic equipment.

Note: Since the scrap electronic equipment may contain hazardous waste, the weight may contribute to the facility's overall hazardous waste storage threshold of 2,200 pounds (to continue to be a conditionally exempt small quantity generator of hazardous waste). If this is the case, the scrap electronic equipment must be disposed of or shipped for recycling.

- Inspect scrap electronic equipment storage area quarterly.
- Maintain log of volumes shipped off site
- Maintain Facility-wide generator log for three (3) years.
- Maintain Facility-wide shipping records for three (3) years

HAZMAT Program Contacts
Facilities O&M Supervisor: 878-7234
Transportation Supervisor: 878-8009
Fond du Lac Environmental Health Specialist: 878-7111

HAZARDOUS WASTES

Including any combination of fuel, paint, solvent, thinners, parts cleaner, metals, unused laboratory chemicals, waste oil, rags, or other hazardous materials not covered by SOPs.

Purpose

Hazardous waste regulations state that anyone who produces or manages a waste must evaluate that waste. Evaluating a waste means determining whether or not the waste is hazardous. Hazardous waste requires special handling and disposal to ensure protection of human health and the environment.

To evaluate your waste, information can be found in the Safety Data Sheets (SDSs) of the chemical to be disposed, or employees' knowledge about the process. If you have no information about a waste, it may be necessary to have the waste analyzed by a laboratory (Andrea Junker/8011).

To determine whether or not your waste is hazardous, use the information you have gathered to answer the following questions for each waste you have:

- Is the waste *listed* as a hazardous waste? (See Table 1)
- Is the waste hazardous because it exhibits a hazardous *characteristic*? (See Table 2)

If you answered yes to one of the previous questions regarding your waste, you need to follow this SOP.

If you have determined that you generate no hazardous waste by the procedures described above, and no other SOP reflects your waste, you may stop here and dispose of it as a solid waste. If you need more help, contact **Andrea Junker/Environmental Health Specialist at 878-7111** for any assistance.

Responsibilities for all staff

1. If you determine the waste to be hazardous, contact Maintenance (School: x7234) or Mike Quam (Transportation): 878-8009 to arrange for a drop-off.
2. Transport the waste in a secure fashion to avoid spillage and contamination of other materials to **FDL Waste Facility**. No more than one 55-gallon container is permitted in government vehicles one at a time.
3. If a labeled accumulation container for your waste does not exist, label or mark your container with
 - The words "Hazardous Waste,"
 - A clear description of the waste, and
 - The date the waste was accumulated.
4. Complete Waste Generator Log.

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Review Date: 8/1/23

Contact: Maria Defoe: 878-7259

SOP Basis: 40 CFR 262 for Hazardous Waste Management

What if . . .

Rags are used, are those hazardous waste?

Maybe; it depends on what the rag was used for. Refer to the Rags, Towels, Wipes, and Absorbents SOP.

I find a bucket of unknown liquid or other abandoned waste in a parking lot/along the road/washed onshore?

Ensure that the area is secure and contact the Emergency Response Coordinator **Dan Anderson/x7259** or the Tribal (**Andrea Junker/8011**) for the proper response.

I find a bucket of unknown liquid or other abandoned waste in a parking lot/along the road/washed onshore, and am pretty sure I know what the substance is?

If you have not undergone OSHA Hazardous Waste Operation Procedures and Emergency Response (HAZWOPER) Emergency Responder Training, you cannot pick-up the waste.

A hazardous waste that I'm transporting comes in contact with another material?

The material that came in contact with the hazardous waste is now considered hazardous waste and must be handled as such.

My hazardous waste has spilled?

Spilling hazardous waste is different than spilling a hazardous material because the waste may be an unstable material. There are different regulations that deal with cleaning up hazardous waste.

Unless you have been properly trained in these regulations, call 911 if it is a spill that is out of control, otherwise, contact **Dan Anderson/x7259**.

Different types of wastes can be mixed to save space?

Mixing chemicals overall is a bad idea, unless you are in a laboratory. Mixing different types of chemicals can make the solution unstable, possibly resulting in fire or explosion! Some examples of incompatible reactions include:

Acids + Oil or Grease = Fire

Acids + Caustics = Heat/Spattering

Caustics + Epoxies = Extreme Heat

Chlorine Gas + Acetylene = Explosion

Flammable Liquids + Hydrogen Peroxide = Fire/Explosion

Aluminum Powder + Ammonium Nitrate = Explosion

Sodium Cyanide + Sulfuric Acid = Lethal Hydrogen Cyanide

Ammonia + Bleach = Noxious Fumes

Additional Responsibilities

Point of Contact for designated location:

- Ensure that all contents received are labeled according to the SOP.
- Ensure that the generator log is completed.
- Ensure waste storage is compatible with surrounding material.
- Forward generator log to HAZMAT Program Contacts weekly.
- Contact HAZMAT Program Contacts to arrange a pick-up of the waste if container is approaching full.

Location Contacts
Facilities O&M Supervisor: 878-7234
Transportation Supervisor: 878-8009

HAZMAT Program Contacts

- Arrange for final identification (i.e., TCLP testing) of waste, if needed.
- Arrange for ultimate disposal of hazardous waste.
- Weekly inspect hazardous waste storage area and fill out inspection log.
- Ensure that storage quantity does not exceed 2,200 pounds of hazardous waste; or 2.2 pounds of acute hazardous waste.
- Respond to spills.
- Maintain log of volumes shipped off site.
- Maintain Facility-wide generator log for three (3) years.
- Maintain Facility-wide shipping records for three (3) years.
- Maintain complete recordkeeping, including:
 - Generator Log indicating quantities generated each month.
 - Waste determination and related SDSs.
 - Transporter name, phone number, and permit number.
 - Disposal site name, phone number, permit number, and recycling/disposal method.

HAZMAT Program Contacts
Fond du Lac Environmental
Health Specialist
878-7111

Waste Evaluation Tables

Table 1. Common Listed Wastes (40 CFR 261)

Hazardous wastes from non-specific sources such as:

- F001: spent halogenated solvents used in degreasing, such as trichloroethylene, methylene chloride, 1,1,1-trichloroethane and carbon tetrachloride;
- F002: spent halogenated solvents such as those above but *not* used as degreasers, other examples are chlorobenzene, 1,1,2-trichloro- and 1,2,2-trifluoroethane;
- F003: spent nonhalogenated, ignitable-only solvents such as xylene, acetone, methanol and methyl isobutyl ketone;
- F004 spent nonhalogenated solvents such as cresols, cresylic acid and nitrobenzene;
- F005: spent nonhalogenated solvents such as toluene, methyl ethyl ketone, carbon disulfide and benzene;
- Spent solvent mixtures/blends containing 10% *before use* of F001, F002, F004, and/or F005, and;
- Various spent baths and solutions, distillation bottoms, wastewaters and filters.

Hazardous waste from specific sources such as preserving wood; formulating inks, pigments, chemicals, and pharmaceuticals, petroleum refining and metal smelting (K-list).

Discarded commercial chemical products, off-specification products, containers and/or spill residues (P- and U-lists).

Table 2. Characteristic Wastes

Ignitable waste - D001:

A liquid waste having a flash point less than 140° Fahrenheit; or, a non-liquid waste which is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture, or spontaneous chemical changes and when ignited, burns so vigorously and persistently that it creates a hazard; or, an ignitable compressed gas.

Oxidizing waste - D001:

Wastes which add oxygen to a fire. Oxidizing substances often have *per* as the beginning of the name, *oxide* as the ending of the name, or *ate* in its chemical name.

Corrosive waste - D002:

Water-based waste having a pH of 2.0 or less (strong acids) or 12.5 or more (strong bases); also, any material able to corrode 1/4 inch of steel per year.

Reactive waste - D003:

Unstable or explosive wastes; wastes which react violently in the presence of water; and, sulfide or cyanide-bearing wastes which, when exposed to pH conditions between 2.0 and 12.5, give off toxic vapors.

Toxicity characteristic waste - D004-D043:

Waste which, under acidic conditions, releases toxic metals, pesticides or volatile organic chemicals above certain limits. This classification includes these metals: arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver.

FLUORESCENT LAMPS

Including high intensity discharge, neon, mercury-vapor, high pressure sodium, and metal halide lamps

Purpose

Fluorescent lamps and high-intensity discharge (HID) lamps, including mercury vapor, high-pressure sodium, and metal halide lamps may be banned from solid waste disposal because they contain mercury. Even though new technology has reduced the amount of mercury in some fluorescent lamp brands (i.e., Phillips Alto “Green Tips”) and lamps may pass the Toxicity Characteristic Leaching Procedure (TCLP), this law still applies.

Responsibilities for all staff

1. Transport lamps in a safe and efficient manner that prevents lamp breakage. A cardboard box or similar is adequate. Do not tape lamps together.
2. Drop off lamps to the nearest designated location:

Site	Location	Contact
Ojibwe School	49 University Road	878-7234

3. Complete log sheet on storage box.
4. Contact Lamp Point of Contact if boxes are full or unavailable.

What if . . .

I can't pick up the lamp when I see it (because of time constraints, vehicle limitations)?

Ensure that the lamp won't break at the current storage location. If you know you won't be able to come back for it in a reasonable amount of time (i.e., a day), call site contact (see above table) and alert them to the location of the lamp so that they can arrange for it to be picked up.

A lamp is accidentally broken?

Sweep up the remains of the lamp and place contents in non-metal closed container marked “Broken Fluorescent Lamps.” Drop off the closed container at the designated location (listed above) and alert that location point of contact that you dropped off a broken lamp.

Effective Date: 7/1/09	Review Date: 8/1/23
Contact: Maria Defoe 218-878-7259	SOP Basis: 40 CFR 273 for Universal Waste Management

Additional Responsibilities

Point of Contact for each designated location: Brian Lafontaine/Ojibwe School ext. 7234

- Label storage boxes as “Universal Waste – Lamps”
- Label storage boxes with date that storage of lamps in box began.
- Inspect storage area regularly for:
 - Breakage of lamps and clean-up.
 - Available space in box for lamps.
 - Completion of Log Sheet from drop-offs.
- Manage broken lamps as hazardous waste. Refer to Hazardous Waste SOP.
- Contact HAZMAT Program Contacts for a new box when existing box is approaching full AND to arrange for a pick-up of full lamp box.

HAZMAT Program Contacts

- Inspect all storage areas at least quarterly.
- Arrange for delivery of new storage boxes and off-site shipping of full boxes.
- Ship out broken lamps with recycler (if they accept the waste) or manage according to full hazardous waste regulations.
- Maintain shipping records of lamps, including volume, date, facility, and documentation of recycling for three (3) years.
- Maintain a log to assure less than 5,000 kg of batteries, fluorescent lamps, and pesticides are generated each year for Universal Waste requirements.
- Maintain facility-wide generator log for three (3) years.

HAZMAT Program Contact
Fond du Lac Environmental
Health Specialist
Andrea Junker 878-7111

Spent Lead Acid Batteries (SLABs)

Including car batteries

Purpose

If not managed properly, spent lead-acid batteries (SLABs) may leak or spill and cause lead and/or acid contamination of the soil and ground water. Fortunately, SLABs may be recycled, which reduces both the potential for contamination and the ability to reuse components for new batteries. When a spent battery is collected, it is sent to a permitted recycler where the lead and plastic are reclaimed and reused in the manufacture of new lead-acid batteries.

Responsibilities for all staff

1. Transport battery, either generated by the facility or found abandoned on facility property, to the Ojibwe School Custodial Department.
2. Mark or label the battery with the date, name, and "Spent Battery – To be recycled".
3. Complete Waste Generation Log.
4. Alert **Maintenance/878-7234** or **MikeQuam/878-8009** that batteries have been dropped off.
5. Contact **Andrea Junker/Environmental Health Specialist at 878-7111** for any assistance.

What if . . .

I can't pick up an abandoned battery when I see it (because of time constraints, vehicle limitations, etc)?

If you know you won't be able to come back for it in a reasonable amount of time (i.e., a day), call the Maintenance Dept. at **x7234** and alert them to the location of the battery so that they can arrange for it to be picked up.

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Review Date: 8/1/23

Contact: Maria Defoe 218-878-7259

Fond du Lac Ojibwe School Standard Operating Procedure

Additional Responsibilities

Point of Contact for lead acid batteries:

- Inspect storage area quarterly.
- Arrange for battery drop-off at least quarterly.
- Maintain recycling records to include the date and number of batteries recycled.
- Submit recycling records to HAZMAT Program Contacts quarterly.

Lead Acid Battery Contact
School Maintenance: 878-7234
Transportation: 878-8009

HAZMAT Program Contacts

- Maintain facility-wide recycling logs for three (3) years.
- Maintain records demonstrating the disposal facility's name, address, phone number, and recycling method.

HAZMAT Program Contacts
Fond du Lac Environmental
Health Specialist
Andrea Junker 878-7111

Scrap Metal

Including rods, bolts, wheel weights, car parts, siding, plumbing, catalytic converters, and wiring.

Purpose

Scrap metals are bits and pieces of metal parts or pieces which, when worn or unneeded, can be recycled. Some scrap parts contain lead — a toxic substance and potential pollutant. Scrap catalytic converters contain platinum — a valuable, recyclable metal. Managing scrap metals safely will prevent contamination on site.

Responsibilities for all staff

1. Alert the Facilities O&M Supervisor (878-7234) or Transportation Supervisor (878-8009) of scrap metal delivery.
2. Transport scrap metals in a safe and efficient manner to the School Custodial Department
3. Deliver scrap metal to the designated area of Ojibwe School Maintenance Department
4. Complete Waste Generation Log.
5. Contact **Andrea Junker/Environmental Health Specialist at 878-7111** for any assistance.

What if . . .

The metal I have contains lead (e.g., tire weights, battery cable ends, radiators, heater cores, soldered parts)?

Store scrap metal items containing lead in a covered container that is capable of handling the excessive weight of the lead. Marking the container "Lead Scrap Metal" will help ensure non-lead scrap metal is not mixed with it. Store lead scrap metal in a covered container in such a way that will prevent contact with rain, snow, and storm water. Battery cable ends can be left attached to the battery and recycled along with the battery.

The scrap metal cannot be easily moved (e.g., old machinery)?

Cover the scrap metal as best you can to avoid any storm water contamination. Ensure that the machinery is empty of all fluids to prevent leakage. Arrange for a scrap metal hauler to pick-up the scrap metal as soon as possible.

Effective Date: 7/1/09

Review Date: 8/1/23

Contact: Maria Defoe 218-878-7259

Additional Responsibilities

Point of Contact for scrap metal

- Inspect storage area to ensure good housekeeping.
- Arrange for delivery of scrap metal to local hauler for ultimate recycling/disposal.
- Ensure those dropping off scrap metal complete generator log.
- Recycle lead parts with a metals or battery recycler.
- Forward generator log and disposal records to the HAZMAT Program Contacts upon delivery to hauler.

Scrap Metal Contact
School Maintenance: 878-7234
Transportation: 878-8009

HAZMAT Program Contacts

- Inspect storage area quarterly for housekeeping issues.
- Maintain records of scrap metal recycling and disposal for solid waste management analysis.

HAZMAT Program Contacts
Fond du Lac Environmental
Health Specialist
Andrea Junker 878-7111

Scrap Metal

Including rods, bolts, wheel weights, car parts, siding, plumbing, catalytic converters, and wiring.

Purpose

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Responsibilities for all staff

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Effective Date: 7/1/09

Review Date: 8/1/23

Contact: Maria Defoe 218-878-7259

Additional Responsibilities

Point of Contact for scrap metal

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Scrap Metal Contact
School Maintenance: 878-7234
Transportation: 878-8009

HAZMAT Program Contacts

- Inspect storage area quarterly for housekeeping issues.
- Maintain records of scrap metal recycling and disposal for solid waste management analysis.

HAZMAT Program Contacts
Fond du Lac Environmental
Health Specialist
Andrea Junker 218-878-7111

Rags, Towels, Wipes, Sorbents

Purpose

Cloth towels, paper wipes, or other absorbent materials may be hazardous and require special handling if they are used for solvents, paints, or oils. Inappropriate handling may impact employee health and safety. Improper disposal may result in environmental harm and may increase the BIA's liability.

Responsibilities for all staff

For rags used for an ignitable solvent

1. Use rag until saturated with solvent or can longer be used.
2. Wring any excess solvent from rag; reuse or dispose of solvent liquid as hazardous waste (see Hazardous Waste SOP). Rags that have been wrung dry or that become dry through use are non-hazardous and may be reused.
3. Double bag and dispose of rags as solid waste.

For rags used for oil

1. Reuse rags until unusable.
2. Wring rag to remove any free liquid. Reuse oil or manage as used oil.
3. Store rags in a closed leak-proof container marked "Used Oil Sorbents (Towels/Wipes).
4. Double bag and dispose of as solid waste.

For rags used for: 1) listed* hazardous waste or 2) characteristic* hazardous waste, other than ignitable solvents. (* See Hazardous Waste SOP Tables 1 and 2)

1. Wring rag to remove any free liquid. Reuse liquid or dispose of as hazardous waste.
2. Manage rags as hazardous waste. Store in a covered leak-proof container marked "Hazardous waste – solvent rags (towels/wipes). Transport container to **Custodial Dept.** for storage. Refer to Hazardous Waste SOP for disposal.

Effective Date: 7/1/09

Review Date: 8/1/23

Contact: Maria Defoe 218-878-7259

Refer to Management Flow Chart for further information.

What if . . .

I let my rags air out or wash them in a clothes washer?

This is not allowed since EPA regards that as treatment of hazardous waste if your rags are determined to be hazardous.

Rag/Sorbents Contact
School Maintenance: 878-7234
Transportation: 878-8009

I see a rag and I don't know what's on it?

That rag then must be tested to determine whether it is hazardous.

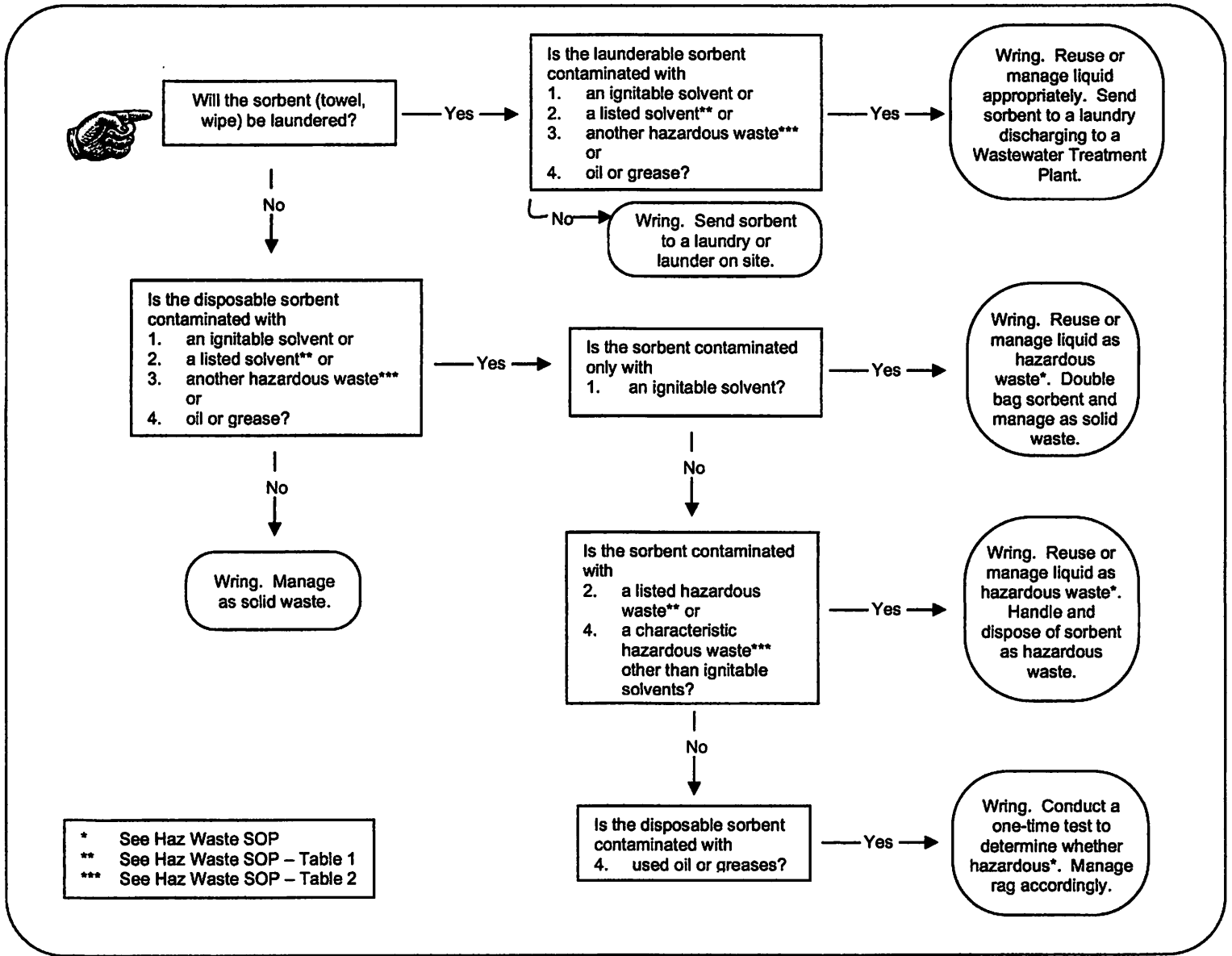
Additional Responsibilities

HAZMAT Program Contacts

- Arrange for final identification of waste, if needed.
- Arrange for ultimate disposal of hazardous waste.
- Weekly inspect hazardous waste storage area.
- Maintain facility-wide generator log for three (3) years.
- Maintain facility-wide shipping records for three (3) years.
- Maintain complete recordkeeping, including:
 - Generator log indicating quantities generated each month.
 - Waste determination and related SDSs.
 - Transporter name, phone number, and permit number.
 - Disposal site name, phone number, permit number, and recycling/disposal method.

HAZMAT Program Contact
Fond du Lac Environmental
Health Specialist
Andrea Junker 878-7111

Management Flow Chart



Fond du Lac Ojibwe School Standard Operating Procedure

UNMARKED/UNLABELED CONTAINERS

POSSIBLE AREAS OF CONCERN

Unmarked/Unlabeled containers and chemicals can pose a great risk to people and the environment.

CHARACTERIZATION

Chemical identification/determination must be made for proper disposal. Testing of unknowns is very expensive. Every effort should be made to maintain container labels and identification of materials/chemicals to comply with laws and regulations.

HANDLING PROCEDURES

Step 1 Make every attempt to identify possible contents.

Step 2 Hazardous materials/chemical containers must be marked or labeled to identify the containers content.

Step 3 If unable to identify the material/chemical, contact Fond du Lac Environmental Health Specialist Andrea Junker: 218-878-7111



Unlabeled containers pose a threat to people and the environment

GENERAL INFORMATION

Testing for unknowns is very expensive. Please make every effort to keep containers marked/labeled and identified at ALL times. For additional information contact

Effective Date: 7/1/13	Review Date: 8/1/23
Contact: Maria Defoe 218-878-7259	School Maintenance: 878-7234

USED OIL FILTERS

Including engine oil, transmission fluid, lubricating oil, hydraulic oil, gear oil, cutting oil, grease and brake fluid.

Purpose

Used oil filters often contain hazardous contaminants that were contained in the oil, such as flammable fuels and their additives, lead, and other toxic metals. Used oil filters that have not been properly drained can discharge oil, which can kill vegetation and wildlife and pollute surface water and ground water.

Responsibilities for all staff

1. Remove filter from engine while warm and drain free flowing oil immediately.
2. Puncture the filter dome to drain the excess oil into an appropriate container (above 60 degrees Fahrenheit) for at least 24 hours - until you are sure there is no free-flowing oil.
3. Label the container in which the filters drain as "Used Oil".
4. Ensure only used oil goes into the container.
5. Dispose of the filter in the "Used Oil Filter" container drum located next to used oil tank.
6. Complete Waste Generator Log for each filter disposed.

What if . . .

The filter is a terne-plated filter from a large piece of machinery?

Terne-plated filters contain lead and must be managed as hazardous waste. Drain the filter as you would a regular one, but manage it as hazardous waste. Refer to Hazardous Waste SOP.

I need to dispose of a fuel filter?

Fuel filters are considered hazardous waste due to its flammable characteristic. The filter must be managed as a hazardous waste. Some automotive waste companies may be able to pick-up such wastes.

Effective Date: 7/1/09	Review Date: 8/1/23
Contact: Maria Defoe 218-878-7259	

Additional Responsibilities

Point of Contact for used oil filters:

- Inspect storage drum weekly.
- Arrange for used oil filter pick-up when drum is approaching full.
- Maintain used oil filter shipping documentation.
- Submit Waste Generation Log to HAZMAT Program Contacts quarterly.

**Used Oil Filter Contact
Transportation Supervisor:
218-878-8009**

HAZMAT Program Contacts

- Maintain facility-wide recycling logs for three (3) years.
- Maintain records demonstrating the disposal facility's name, address, phone number, and recycling method.

**HAZMAT Program Contact
Fond du Lac Environmental
Health Specialist
Andrea Junker: 878-7111**

USED OIL

Including engine oil, transmission fluid, lubricating oil, hydraulic oil, gear oil, cutting oil, grease, and brake fluid.

Purpose

Used oil often contains hazardous contaminants, such as flammable fuels and their additives, lead, and other toxic metals. Used oil that is disposed of improperly can kill vegetation and wildlife and pollute surface water and ground water.

Responsibilities for all staff

1. Ensure that the used oil is not mixed with other substances (e.g., gasoline, solvents, diesel, kerosene, other fuel oils, paints, antifreeze, and thinners).
2. Transport used oil in a covered, leak-proof container labeled "Used Oil" to **Ojibwe School Transportation Bldg.**
3. Dispose of used oil in **Transportation Bldg. Used Oil Container.**
4. Complete Waste Generation Log.

What if . . .

There are other contaminants, such as solvent, gasoline, or antifreeze, in my used oil?

Since those contaminants may have hazardous characteristics, we assume that the mixed oil will display those same hazardous characteristics. For waste solvents and gasolines, refer to the Hazardous Waste SOP; for waste antifreeze, refer to the Spent Antifreeze SOP.

I spill my used oil?

If you have been trained to participate in the Awareness Level of the facility's Emergency Action Plan (EAP), and the spill is less than five (5) gallons, you may clean up the spill. Attempt to wring out all used oil from rags/sorbents used and dispose of as used oil. Double bag rags/sorbents and dispose of according to guidance provided in the Rags, Towels, Wipes, and Sorbents SOP.

If you have not been trained in the EAP, or the spill is greater than five (5) gallons, then contact the Emergency Response Coordinator (Dan Anderson 878-7259) or the Andrea Junker/Environmental Health Specialist (878-7111) for the proper response.

Effective Date: 7/1/09	Review Date: 8/1/23
Contact: Maria Defoe 218-878-7259	School Maintenance: 218-878-7234

Additional Responsibilities

Point of Contact for used oil:

- Label used oil storage tank "Used Oil."
- Inspect storage tank weekly.
- Arrange for used oil pick-up when tank is approaching full.
- Maintain used oil shipping and generator log.
- Submit logs records to HAZMAT Team quarterly.

**Used Oil Contact
Transportation Supervisor:
218-878-8009**

HAZMAT Program Contacts

- Maintain facility-wide recycling logs for three (3) years.
- Maintain records demonstrating the disposal facility's name, address, phone number, and recycling method.

**HAZMAT Program Contact
Fond du Lac Environmental
Health Specialist
Andrea Junker: 878-7111**

Waste Tires

Purpose

Tires that are stockpiled present a potential fire hazard that could threaten natural resources by polluting air, soil, and water. And, because they burn very hot and are very difficult to extinguish, they may pose a safety hazard for fire personnel and others in the area. Tires also make an excellent breeding ground for disease-carrying mosquitoes if stored outside.

- Responsibilities for all staff**
1. Transport waste tires, either generated by the facility or found abandoned on facility property, to Fond du Lac Transportation Department
 2. Alert Transportation Supervisor that tires have been dropped off.

What if . . .

I can't pick up an abandoned tire when I see it (because of time constraints, vehicle limitations, etc.)?
If you know you won't be able to come back for it in a reasonable amount of time (i.e., a day), call Education Administration (878-7241) and alert them to the location of the tire so that they can arrange for it to be picked up.

Additional Responsibilities

Point of Contact for waste tires:

**Waste Tires Contact
218-878-8009**

- Inspect storage area quarterly.
- Arrange for tire drop-off at a certified used tire recycling/disposal site at least quarterly.
- Maintain recycling records to include the date and weight of tires recycled.
- Submit recycling records to HAZMAT Program Contacts quarterly.

HAZMAT Program Contacts

**HAZMAT Program Contact
218- 878-7111**

- Maintain facility-wide recycling logs for three (3) years.
- Maintain records demonstrating the disposal facility's name, address, phone number, permit, and recycling method.

Effective Date: 7/1/09	Review Date: 8/1/23
Contact: Maria Defoe 218-878-7259	School Maintenance: 218-878-7234