



# CHEMTRON CORPORATION

## WINTER 2006 NEWSLETTER

### The Chemtron Mission

We offer you:

A single source for complete environmental services

A highly trained and experienced staff of dedicated environmental professionals

Innovative yet cost-effective solutions to your dynamic environmental challenges

A steadfast commitment to protect the environment

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CHEMTRON CORPORATION

35850 Schneider Court  
Avon, Ohio 44011

Customer Service  
Phone 440.933.6348  
Fax 440.933.9500

## Identifying Hazardous Wastes

EPA requires that generators identify their hazardous wastes by determining if: (1) the waste is excluded from generation, (2) the waste is a listed waste, and (3) the waste is a characteristic waste. (40 CFR 262.11). This three part requirement seems simply on its face, but there are many issues to consider as you determine if your waste is a hazardous waste or not.

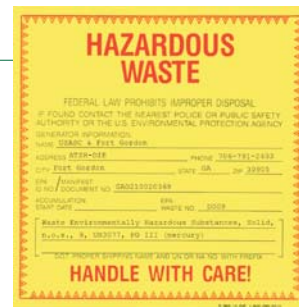
### Is the Waste Excluded from Regulation?

The first step in hazardous waste determination is to decide if your material is a waste at all. Typically, materials that are discarded, disposed of, abandoned, burned or incinerated are considered "solid wastes" under EPA definitions. Materials that are accumulated, stored, or treated prior to or in lieu of being abandoned by being disposed of, burned, or incinerated will also be considered solid wastes. "Solid wastes" should not be confused with the physical states of

solid, liquid or gas. Materials like gasoline and aerosols can be considered solid wastes just as contaminated soil can be a solid waste.

Once a generator has determined that they are managing a waste, the generator should review the regulations to see if the waste is excluded from solid waste regulation or hazardous waste regulation. Many of these exclusions are published in 40 CFR 261.4. Materials such as domestic sewage and certain industrial wastewater discharges are exempt from solid waste regulation. If a material is not a solid waste, it cannot be a hazardous waste. Certain solid wastes, like household wastes and mining overburden returned to the mine site are exempt from hazardous waste regulation.

EPA lists nearly 40 wastes that are exempt from solid or hazardous waste regulation and 40 CFR 261.4 so be sure to read it.



Hazardous wastes must be labeled with a label like the one shown here.

### Is the Solid Waste a Listed Waste?

The second step of hazardous waste determination is to determine if the solid waste is considered a "listed waste." The listed wastes include hazardous wastes from non-specific sources ("F" codes), hazardous wastes from specific sources ("K" wastes), and discarded commercial ...

(Continued on page 3)

## First Quarter Deadlines Loom...

Most professionals that work regularly with EPA and OSHA regulations know that the first quarter has many critical deadlines.

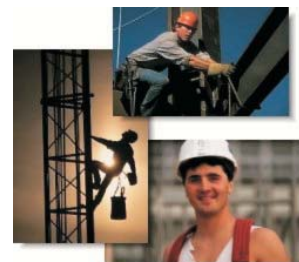
- February 1: The OSHA 300A (Summary of OSHA 300 Log) must be certified by a company executive and posted until April 20, 2006.
- February 17: Spill Prevention, Control, and Countermeasure Plans (SPCC) plans must be amended. SPCC Plans must be implemented by August 18, 2006.

- March 1: Annual Hazardous Waste Report due in applicable states. Biennial Reports due in some states.

If you need assistance meeting these deadlines or unsure if the deadlines apply to you, be sure to contact your Territory Managers today.

### Upcoming Dates

- July 1:** Toxic Release Inventory (TRI/Form R) Report Due
- September 5:** New Hazardous Waste Manifest becomes mandatory.



## WORKING IN COLD WEATHER



Working in cold weather presents hypothermia and frostbite hazards to employees. These two hazards can be avoided by providing employees with some basic tools to recognize symptoms and to protect themselves.

Hypothermia is a condition of body chilling that occurs when the body loses heat faster than heat can be produced by muscle contractions, metabolism, and shivering. The human body has a normal body temperature of 97.6° to 99.6° with 98.6° being average. The body begins to stress when the body's temperature drops to less than 95°. It is very possible to get hypothermia on a 50° day, it does not only happen during the dead of winter.

The early stages of hypothermia are characterized by shivering, pain from cold, numbness in the limbs, loss of dexterity, and clumsiness. It is important at this stage to treat the victim by preventing further heat loss, giving sweet liquids (like hot cocoa), applying a warm heat source, and mild exercise. As hypothermia becomes more severe, shivering begins to stop, the body's trunk gets colder, muscles become more rigid, and the victim can lose consciousness. When the victim slows or stops shivering, this is the warning sign that things are getting worse. At this point, it is critical that immediate action is taken to gently warm the person without too much jarring.

Frostbite is freezing of the skin and the tissues under the skin. Frostbitten skin

looks pale or blue and feels cold, waxy, numb, and stiff or rubbery to the touch. Frostbite usually affects fingers, hands, toes, feet, ears and nose. Treat a victim with frostbite by moving them to a warm dry area, removing any wet or tight clothing, and gently warming the affected area. Do not rub the affected area in order to warm it! Try to remember that the affected area is frozen and rubbing it may detach tissue which effectively kills it.

The acronym C-O-L-D is helpful to remember a few tips in preventing injury from cold exposure:

**C** "Cover" your head, neck and face as much as possible. A lot of heat loss can occur in these areas. These areas are also at risk for frostbite. Apply lip protection and apply petroleum jelly to the face when another covering is not available.

**O** "Overexertion" causes you to sweat and chill more quickly. Sweating causes clothing to become damp and increases heat loss. Try to pace yourself during activities in the cold.

**L** "Layers" of clothing will keep you warm and is the best protection.

**D** "Dry" is key in preventing cold injury. Keeping dry with waterproof clothing reduces heat loss.

We all have images of the St. Bernard plowing thru the snow with a barrel of brandy around its neck coming to the rescue. Unfortunately, the St. Bernard is great in movies and cartoons, but not in real life. Try to avoid alcohol and caffeine when working in the cold. Alcohol will not make you warmer.

Fluid consumption (like water) may be as important in the winter as it is in the summer. Warm beverages and soups are very helpful to keep your body temperature normal. If you must drink coffee or tea, reach for a decaffeinated brand to help you keep warm during those cold winter months.

Just like chemical toxicity, every person is different and each person will react differently from being in the cold. As a general rule however, people with predisposing health conditions such as cardiovascular disease, diabetes, hypertension, and poor physical condition will have an increased risk. This at-risk group also includes people on medications.

Finally, use some common sense when working in the cold and treat it like any other hazard.

- Make sure there is an adequate means of communicating if medical help is needed.
- Use the "buddy system."
- Take frequent breaks.
- Avoid exhaustion and fatigue.



## USEPA PROPOSES NEW DRY CLEANING REGULATIONS

In December 2005, EPA proposed regulations to reduce the health risks posed by perchloroethylene ("Perc") from dry cleaners. As part of the proposal, EPA is seeking additional information on how it may be able to reduce risks even further.

The proposed rule will affect three types of dry cleaners that use Perc: (1) large, industrial and commercial dry cleaners, (2) smaller free standing dry cleaners, and (3) smaller dry cleaners located in apartment buildings.

Under the proposed rule, large industrial and commercial dry cleaners (about 15 nationwide) will be required to meet equipment standards that recover Perc vapors and prevent Perc emissions and to monitor for leak detection on a monthly basis with specialized equipment. Small Freestanding Dry Cleaners (about 27,000 nationwide) will be required to have the same equipment standards and a more simple leak detection program.

In addition, all transfer machines would be eliminated. EPA proposed two options

for small dry cleaners in apartment buildings (about 1,300 nationwide): (1) a residual risk approach or (2) a technology proposal.

There are many costs associated with meeting these proposed regulations but also significant savings by reducing emissions. EPA is under a court order to issue a final rule by April 28, 2006, so stay tuned for more developments.



All sizes of dry cleaners will be affected by this proposed rule that is due by April 28, 2006.

## IDENTIFYING HAZARDOUS WASTES *(continued)*

chemical products ("U" and "P" wastes).

Generators must review each of the listed waste categories in 40 CFR 261.30-261.33. The review is typically a paper review only and does not usually require any analysis.

The non-specific source listing includes hazardous wastes like spent solvents. It does not matter what process the spent solvents are generated from, it only matters that they are spent.

The specific source listing includes specific hazardous wastes from specific industries like wood preservation, inorganic pigment production, organic chemical production, etc. The list contains hazardous wastes from more than ten specific industries.

The final specific source listing includes a list of discarded commercial chemical products. There are more than 450 chemicals that are listed along with their Chemical Abstracts Number. When discarding an unused chemical (or an unused mixture where the chemical is the sole active ingredient) that is found

on the list, the chemical is a hazardous waste. The listing also includes certain off specification species, container residues, and spill residues of these specific chemicals.

### Is the Solid Waste a Characteristic Waste?

The third step of hazardous waste regulation is to determine if the solid waste is a characteristic waste. There are four characteristics of hazardous wastes: ignitable, corrosive wastes, reactive wastes, and toxic wastes.

The ignitable waste definition includes liquids with a flash point less than 140F; solids that cause fire thru friction, absorption of moisture, or spontaneous chemical changes;; ignitable compressed gases; and oxidizers are defined in the D.O.T. regulations. The corrosive waste definition includes aqueous wastes with a pH 2 or >= 12.5 and other specified corrosive liquids. The reactive wastes definition includes wates that are vigorously reactive with water, have explosive properties, or are toxic due to cyanide or sulfide.

Finally, toxic wastes include 40 different wastes that exceed a regulatory level. One example is lead which has a regulatory level of 5.0 mg/l (ppm). When a waste has more than 5.0 mg/l of lead, it is considered a hazardous waste. Generators may either test their waste and compare the results to the 40-chemical list or apply their knowledge of their waste. For instance, if their process does not contain anything with lead in it, they can apply their knowledge of the process generating the waste instead of testing the waste for lead.

This is a very brief summary of a very detailed hazardous waste determination. Please contact Chemtron for assistance or a quote to analyze your waste.



P098?

D037?

F003?

K051?

U228?



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[www.chemtron-corp.com](http://www.chemtron-corp.com)



**WE ARE ON THE WEB!**



35850 Schneider Court  
Avon, Ohio 44011

**Customer Service**  
Phone 440.933.6348  
Fax 440.933.9500

CHEMTRON CORPORATION IS A FULL SERVICE PART-B PERMITTED TREATMENT, STORAGE, AND DISPOSAL FACILITY.

Chemtron's services include:

- Waste Disposal Services
- Waste Analysis Services
- Turnkey Lab Pack Services
- Commodities Management Services
- 24-hour Emergency Response Services.
- Remediation Services
- Industrial Cleaning Services
- Training Services (OSHA, RCRA, & DOT)
- Comprehensive Compliance Services Programs
- Full Line of Sorbent Products

Chemtron also offers total waste management programs tailored to fit your needs. Contact your Chemtron representative for more information.

Call us today at 440-933-6348 or visit us on the web at [www.chemtron-corp.com](http://www.chemtron-corp.com).

## UPCOMING TRAINING DATES

March 23:	8-hour Hazwoper Refresher
March 24:	RCRA Refresher
March 24:	DOT Refresher
June 22:	8-hour Hazwoper Refresher
June 23:	RCRA Refresher
June 23:	DOT Refresher
September 21:	8-hour Hazwoper Refresher
September 22:	RCRA Refresher
September 22:	DOT Refresher
December 7:	8-hour Hazwoper Refresher
December 8:	RCRA Refresher
December 8:	DOT Refresher



**CALL US**



Contact Michelle Haynes at 440-933-6348 extension 3359 to sign up for these classes or to inquire about how Chemtron can fulfill your other training needs. Classes are located at Chemtron's training facility in Avon Lake, Ohio.