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Management Plan for Hazardous Waste

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Northfield Public Schools

Management Plan for Hazardous Waste

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1.0 Evaluating Waste

Northfield Public Schools evaluates waste products for recycling and disposal from the science, art, industrial technology, custodial, and health departments. Waste is considered hazardous if it meets one of the following criteria:

- The waste is listed in the Minnesota Hazardous Waste Rules
- The waste is ignitable, corrosive, reactive, lethal, or an oxidizer
- The waste fails a Toxic Characteristics Leaching Procedure (TCLP) test
- The waste contains polychlorinated biphenyls (PCBs) in concentrations of 50 ppm or greater

2.0 Licenses and Registrations

Northfield Public Schools applied for and received a registration number from the Environmental Protection Agency (EPA) for each building that generates hazardous waste in the district. Northfield Public Schools also applied for and received an annual license to generate hazardous waste from the Minnesota Pollution Control Agency (MPCA). The amount of waste generated determines the size of the generator and the fees that will be charged by the county.

- Minimal Quantity Generator – Generates Less than 10 pounds per year
 - *No fee for this generator status*
- Very Small Quantity Generator (VSQG) – Generates 220 pounds of hazardous waste or less per month.
 - *And less than 2.2 pounds of acutely toxic (P-Listed) waste per month*
- Small Quantity Generator (SQG) – Generates between 220 and 2200 pounds of hazardous waste per month.
 - *And less than 2.2 pounds of acutely toxic (P-Listed) waste per month*
- Large Quantity Generator (LQG) – Generates 2200 pounds of hazardous waste or more per month.
 - *Or more than 2.2 pounds of acutely toxic (P-Listed) waste per month*

Building	EPA ID Number	Address	Waste Generator
High School	MN0000610337	1400 Division Street S. Northfield, MN 55057	Conditionally Exempt Small Quantity Generator
Greenvale Park Elementary	MNS000126755	700 Lincoln Parkway Northfield, MN 55057	Non-Generator
Sibley Elementary	MN0000690412	1400 Maple Street Northfield, MN 55057	Non-Generator

3.0 Storage and Labeling

Hazardous waste throughout the district is stored in sturdy, leak-proof containers located in a central place in each building. These containers are kept closed at all times unless waste is being added or removed. The containers are labeled with the words “Hazardous Waste,” a description of their contents, and the dates on which the wastes were first added. If the hazardous waste is stored outside, the area of storage has controlled access, adequate protection from the elements, and is on a curbed, impermeable surface. Hazardous waste storage areas should be inspected weekly to document that the material is labeled correctly and has not leaked or spilled. Used fluorescent bulbs are stored in the custodial area of each building and labeled appropriately and are protected from breakage.

4.0 Transport and Disposal

Northfield Public Schools uses an environmental vendor to dispose of their hazardous waste. The district documents that the disposal company is properly registered and follows all state and federal regulations for hazardous waste disposal. Collections are scheduled as necessary.

5.0 Manifests

Manifests are created by the vendor with each waste disposal and are confirmed by the district. Each manifest contains six copies. The “Generator Initial Copy” is left with the district when shipping hazardous waste and is filed at the district building generating the waste. A photocopy of “*Generator Initial Copy*” is mailed to the following address within 5 days of shipment:

MPCA
ATTN: HWIMS
520 Lafayette Road North
St. Paul, MN 55155-4194

The remaining five copies continue on with the hazardous waste. Once the wastes reach their final location, one copy of the final manifest is sent to the district and filed. This copy must be received within 30 calendar days of the facility receiving the shipment. If the final manifest copy is not received within 35 calendar days, Northfield Public Schools will contact the end facility to determine the status of the shipment. A copy of this manifest must be sent to the addresses above within 45 calendar days of the waste being accepted at the facility. If the final “facility-signed” copy is not received within 45 calendar days, an exception report must be filed. The exception report will be a letter addressed to the MPCA Commissioner and to the Rice County Hazardous Waste Program. A copy of the exception report must be kept on file for three years.

If you do not receive the *Designated Facility to Generator Copy* within 45 days, submit an exception report to the MPCA by sending:

- A legible copy of the *Generator Initial Copy*.
- A letter documenting your efforts to determine the status of your waste, and obtain the *Designated Facility to Generator Copy*

6.0 Emergency Situations

Northfield Public Schools has emergency procedures in place for hazardous waste spills, leaks, or exposures. These procedures are covered under the Employee Right-to-Know program and the Chemical Hygiene program. Safety Data Sheets (SDSs) are maintained for all hazardous chemicals in the district and can be utilized in the event of an emergency. Spill equipment is provided to employees as necessary.

7.0 Training

Because Northfield Public Schools is a VSQG/MNQG, documentation of training is not required under state law. However, it is recommended that affected employees be trained on hazardous waste found throughout the district. This training is provided as an addition to the annual Employee Right-to-Know training.

8.0 Recordkeeping

Manifests, weekly inspection logs, license applications and renewals, and analytical reports are required to be kept for three years. Land Disposal Restriction forms are required to be kept for five years, and MSDSs are required to be kept for 30 years. Northfield Public Schools maintain all records at the District Office.