Guidance Document

Title: Best Management Practices for the storage of waste dangerous goods/hazardous waste (WDG/HW) at business sites

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Issue Date: September 8, 2015

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GD-PPD-077
BACKGROUND

The Department of Environment and Conservation (ENVC) and its agents at Service NL have responsibilities for protecting, conserving and enhancing the natural environment. A portion of this responsibility is related to the management of Waste Dangerous Goods/Hazardous Waste (WDG/HW) in the Province.

Proper management and handling of WDG/HW is required on properties to avoid or minimize adverse environmental impacts. Owners, managers, operators of businesses are responsible for the management of these wastes and are liable for impacts associated with the release of these wastes into the environment.

WDG/HW(s) are those wastes which, due to their nature (flammable, corrosive, oxidizing, toxic) and quantity, are potentially hazardous to human health and/or the environment and which require special disposal techniques to eliminate or reduce the hazard.

Some examples of WDG/HW include: thinners, sealers, waste oil, grease, fuel, solvents, strong acids and bases, paints, cleaners, oily rags, pharmaceuticals, pesticides, mercury containing bulbs, waste batteries, lab chemicals and other waste.

Solid waste not designated or determined to be as WDG/HW shall be stored in approved containers in a designated area for regular removal to recycling and for disposal at the nearest approved waste disposal site.

The generator shall comply with the following requirements for the storage of WDG/HW (may also apply to storage of dangerous goods) at your site/facility. If operating under a certificate of approval, requirements in the approval take precedence over this guidance.

IDENTIFICATION

The determination of WDG/HW can be based upon general knowledge or laboratory analysis. All generators are required by law to have MSDS for various products they use. This is an important document to describe the characteristics of waste. Generators must determine whether their waste qualifies as a listed hazardous waste under Canadian Environmental Protection Act/Regulations (CEPA); Export and Import of Hazardous Waste and Hazardous Recyclables Regulations (EIHWHRMR) schedules or has dangerous good characteristics as described under Transportation of Dangerous Goods Act/Regulations (TDG) or hazardous based upon other scientific documentation. It is important to keep abreast of current regulatory developments for the classification of waste.

STORAGE
- All containers shall be clearly labeled according to requirements of Workplace Hazardous Materials Information System (WHMIS)/Transportation of Dangerous Act/Regulations. Storage area shall have a sign indicating "Hazardous Waste-Authorized Personnel Only".
- Generators of WDG/HW are permitted to store a maximum of 1000 kilograms (2200 pounds) on site for six months.

- Only compatible WDG/HW shall be stored together. Special precautions are required for ignitable and reactive waste (store to prevent fire and explosion): open and close drums with spark proof bung wrench, don't push, roll or drag, use funnel or hose to add or transfer. These wastes shall be stored 15 meters/50 feet from property line or where space is limited according to National Fire Code and/or municipal bylaws requirements.

- Containers shall be stacked no higher than two drums. Sufficient aisle space is required in order to allow for weekly inspections and accessibility.

- The containers shall be in good condition free of rust and cracks.

- No smoking shall be permitted in the storage area: store away from direct heat and fire; keep the storage site cool and dry.

- Containers of solvents/oil shall be stored on concrete surfaces. Corrosive waste shall be stored on well-sealed corrosive resistant epoxy surface. Containers of WDG/HW stored outside shall be protected from the elements and meet the requirements of Fire Code regulations. Tarps are not permitted.

- Secondary containment is a requirement for container storage (inside and outside); it provides a backup system to prevent release into the environment in case of container fault. Containers shall be in a secondary containment which has the capacity for containment of 110% total volume of containers. Accumulated waste water (storm water, precipitation) shall be prevented from entering containment system. Containers can be stored on top of pallets so there is no contact with waste liquid

**EMERGENCY RESPONSE**

Procedures shall be in place in case of a spill/release or an emergency involving WDG/HW. Workers on site shall be trained in emergency response. Sufficient spill equipment shall be available in the event of a spill/release of WDG/HW on site. Spills/releases on site > than 70 L shall be reported to Environment Canada, National Environmental Emergency Centre (NEEC) @ 772-2083 or 1-800-563-9089 on a 24 hour basis.

**DISPOSAL**

Municipal and industrial landfills in this province are not permitted to accept WDG/HW. All WDG/HW waste shall be managed appropriately and transported to an approved hazardous waste disposal facility. Currently all are outside the province. Generators of WDG/HW are required to be registered with the Department (no fee) prior to transport. All WDG/HW shall be manifested during transport and copies returned to the Department.

**CONTACT**

Contact Joan Hann @ 709-729-1771 or joanhann@gov.nl.ca for additional information on the management of WDG/HW in Newfoundland and Labrador.