

Section I

Common USDA Forest Service Activities

This section of the *Everyday Hazmat User's Training Guide* contains summaries of some of the more common activities that use hazardous materials or generate hazardous wastes. Each activity is subdivided into specific task areas that flag special regulatory concerns either directly, or by referring to hazardous materials management guidelines (section II) or hazardous waste guidelines (section III).

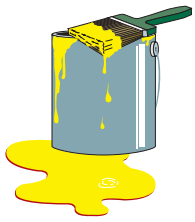
Many regulatory and work and facility safety concerns can be avoided by using products that are not hazardous or that do not create hazardous wastes or air or water pollutants—these are often known as *green* products. Visit the *Everyday Hazmat* Web site for some specific suggestions:

http://www.fs.fed.us/eng/t-d.php?link=everyday_hazmat

USDA Forest Service and Bureau of Land Management employees can access that Web site from their internal computer networks at:

http://fsweb.mtdc wo.fs.fed.us/everyday_hazmat

The guidelines in this section are based on Federal regulations and the requirements of the IFC and NFPA requirements. Your State and local governments may have additional requirements. Your local fire marshal may choose to selectively adopt IFC and NFPA requirements, or may have additional requirements, so contact the fire marshal when appropriate.



Painting

Painting is one of the most common uses of hazardous materials and sources of hazardous waste at all USDA Forest Service units. These activities include interior and exterior painting as well as tree marking. As new types of paints come onto the market, the use of traditional solvent-based and metal-containing paints may end, as may the use of regulated cleaning solvents.

The Activities

Painting Activities—The Processes

Painting activities within the USDA Forest Service have been a common source of regulated materials and worker safety concerns. This guideline identifies some of the most common painting tasks, outlines certain regulatory obligations, and recommends specific changes to reduce regulatory exposure and costs.

Supplies of tree-marking paint often include large quantities of special paints. You may also find large quantities of regulated cleaning solvents (hazardous) that were used with earlier versions of paint. Most of these paints will be found in secured areas.

Another common painting activity is sign painting, which typically requires small volumes of many types of paints and large quantities of hazardous cleaning solvents. Paint removers may be found in open cans used to clean brushes.

You may find many 1- and 5-gallon cans and aerosol canisters of paint used for building maintenance.

Regulated solvents (hazardous) used with oil-based paints can be eliminated by switching to latex paints that are not hazardous. More latex paints are being used in maintenance activities to reduce worker safety concerns, regulatory obligations, and storage expense.



Tree Marking
(See page 15.)

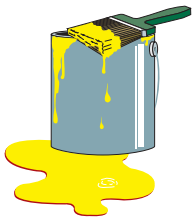


General Painting
(See page 16.)



Handy Tips
(See page 17.)

Typical Painting Activities



Tree-marking activities have traditionally been one of the largest uses of regulated paints and sources of hazardous waste. As water-based tree-marking paint becomes available, the old hazardous paints and cleaning solvents can be eliminated.

Tree Marking

Lead- Based Tree- Marking Paints

Immediately mark these paints as hazardous waste and move them to your hazardous waste accumulation area; see the *Hazardous Wastes* guideline (page 35).

Water- Based Tree- Marking Paints

Water-based tree-marking paints are being distributed for widespread use. Keep them from freezing and maintain appropriate security. Flammable storage is no longer needed. Recycle empty containers or dispose of them in the trash if they are not pressurized.

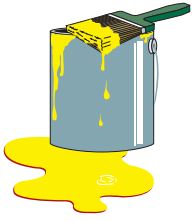
Solvent- Based Tree- Marking Paints

Solvent-based tree-marking paints are being phased out of service. Collect bulk containers and aerosol canisters in a proper storage area (see the *Flammable Liquids* guideline, page 50) and await direction on disposition; maintain appropriate security.

Cleanup Solvents for Tree-Marking Paint

Because regulated paint solvents are not needed with the water-based tree-marking paints, they can be eliminated. If possible, find a way to use unused solvents, and do not order more. If their use is not feasible, move solvents to the hazardous waste accumulation area for disposal (see the *Hazardous Wastes* guideline, page 35).

Be sure to use the MSDS to determine which solvents are hazardous.



Painting will continue to be a USDA Forest Service activity far into the future. In the past, solvent-based paints containing heavy metals were used. However, with today's new products, we have acceptable latex substitutes. All paints containing heavy metals and solvents should be eliminated. With the switch to latex paints, regulated solvents used for cleanup can also be eliminated.

General Painting

Paints Containing Heavy Metals

Unless there is a specific need for these paints, they should be marked as a hazardous waste and moved to the hazardous waste accumulation area; see the *Hazardous Wastes* guideline (page 35).

Latex Paints

Latex paints are available for nearly every painting need. Keep them from freezing. Flammable storage is no longer needed. Recycle empty containers or dispose of them in the trash.

Paint Cleanup Solvents

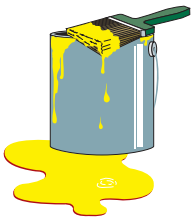
There is no need to use regulated cleanup solvents with latex paint. If possible, find a way to use unused solvents. Otherwise, treat them as a hazardous waste; see the *Hazardous Wastes* guideline (page 35).

Oil-Based Paints

Except for special area applications, eliminate the use of all solvent-based paints, replacing them with latex paints. Use up the remaining solvent-based paint or treat it as a hazardous waste; see the *Hazardous Wastes* guideline (page 35).

Flammable Aerosol Paints

Unless there is a specific need, eliminate all flammable aerosol paints. These are typically marked *extremely flammable* and *dangerous*. Use up what is left, or dispose of the paint as prescribed in the *Aerosol Cans* guideline (page 32).



Use up all solvent- and oil-based paints so you don't have to dispose of them as hazardous wastes. Buy only as much as you need for a task.



Handy Tips

Beware of **cheap**, surplus oil-based paint. It may cost more to dispose of leftovers than you save.

Buy only latex paint.

Phase out all aerosol paints—they are costly to buy, costly to store properly, and costly to dispose of properly.

Never use gasoline for paint cleanup!

Check your community recycling centers to see if they take old paints for recycling.

When you have eliminated your oil- and solvent-based paints, you can eliminate all paint-cleaning solvents (such as mineral spirits).

Look for *green* products at the USDA Forest Service *green* purchasing Web site: http://www.fs.fed.us/eng/t-d.php?link=everyday_hazmat/green.htm



Automotive and Small Engine Services

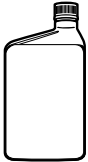
While most automotive maintenance activities have been outsourced, servicing functions are still found in some USDA Forest Service units. Try to eliminate all servicing activities and manage the remaining activities to ensure facility and worker safety and regulatory compliance. Follow these guidelines for specific regulatory concerns and waste reduction recommendations.

The Activities

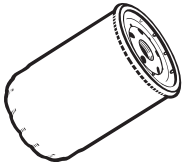
Automotive Servicing—The Processes

Automotive servicing activities at USDA Forest Service units usually range from fueling and fuel storage, to changing oil and oil filters, servicing antifreeze, changing tires, degreasing parts, and changing lead-acid batteries.

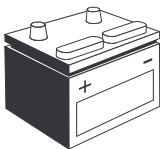
This guideline does *not* cover servicing vehicle air-conditioning systems, repairing and rebuilding engines, cleaning and repairing radiators, repairing brakes, rebuilding transmissions and differentials, and painting vehicles. If some of these activities occur at your USDA Forest Service unit, consider outsourcing them immediately. If you are still performing these tasks, be careful to fulfill your regulatory obligations and to address facility and worker-safety issues.



Used Oil
(See page 19.)



Used Oil Filters
(See page 20.)



Batteries
(See page 21.)

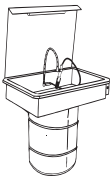


Tire Changes
(See page 22.)

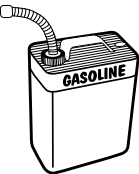
Typical Automotive Servicing Activities



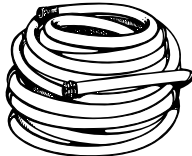
Antifreeze
(See page 23.)




Degreasing
(See page 24.)



Fueling
(See page 25.)



Vehicle Washing
(See page 26.)




Handy Tips
(See page 27.)



Used oil is an automotive servicing waste commonly found at USDA Forest Service units. Following simple procedures that are easy to implement, you can avoid regulatory issues and ensure environmental protection of public land. If you properly collect, store, and recycle your used oil, you do not have to treat it as a hazardous waste. Do not mix other materials with used oil because the used oil will be rejected for recycling if it contains solvents or other hazardous materials that make it a hazardous waste.

Used Oil


Oil Changes

Do NOT throw used oil in the trash or pour it on the ground.



Used Oil Collection Storage


Used oil storage containers (such as tanks or drums) *must* be sound, securely closed at *all* times except when adding or removing used oil, and *must* be marked as *USED OIL*. Lock containers to ensure that only nonhazardous used oil is added to your collection unit. Use secondary containment (such as a metal pan) underneath all used oil collection containers to guard against leakage.

Hazardous Used Oil

Used oil rejected by a recycler, or used oil mixed with solvent, is probably a hazardous waste; see the *Hazardous Wastes* guideline (page 35).

Used Oil Recycling

Recycling is the best management practice for your used oil. Be sure to use a licensed recycler; you may be able to transport up to 55 gallons of used oil at a time in USDA Forest Service vehicles. Check with your State Highway Patrol. Keep all transportation information, including dates, amounts of used oil, destination, the transporter, and the EPA identification numbers of the recycler in your files.



Used Oil Management Checklist

Forest Service Unit: _____ Location: _____

- Store and remove lubricants (e.g., oil) on an area hazardous waste. Used oil may be a hazardous waste if they contain heavy metals or other contaminants picked up through use. Used oils, if you assume they are hazardous, and if treated as outlined below, do not cover towards your unit's hazardous waste generation rate. If your used oil is contaminated beyond certain levels, it must be managed as a hazardous waste.
- Control your used oil collection: try to limit it to one location on your unit.
- Mark all containers with the words "USED OIL," and keep all containers closed at all times except when adding or removing used oil; secondary containment is recommended. Do not use glass containers.
- If possible use a lock with restricted access to your used oil collection container to ensure that no one adds anything that could contaminate your used oil and make it a hazardous waste. Make sure that all used oil added to your collection container is not contaminated.
- Use containers sized for your operations (1-gal, 2.5-gal, 5.5-gal drums) do not use large oil barrel tanks unless there is a specific need - this will minimize the volume of used oil you have at risk for leaching/contaminated.
- Accepting motor amounts of used oil from Forest Service employees whose work/skills are on the home/unit is acceptable: count this oil as that generated by your unit.
- Accepting used oil from another Forest Unit is not usually allowed by most states without a special permit unless done to transport/replenish. Do not accept other generator's used oil, and if you do, be sure to keep a record of date, volume, and source (METS 30250-010).
- You can transport no more than 55 gallons of used oil to a local recycling center at a time.
- If you have a transporter pick up your used oil, be sure to record the transporter's name and EPA identification number, and the destination facility name and EPA identification number; in some states, transporters and recycling facilities require special permits, so record this as well. Be sure to keep records of date, volume, and source (METS 30250-010).
- If you choose not to manage your used oil as described above, or your used oil is contaminated, you must release it to your Hazardous Waste Accumulation Area. Follow all hazardous waste management, transport, and disposal requirements.


Any questions? Contact your Forest or Area Hazardous Waste Coordinator for assistance.

METS 30250-010

Sample training information for personnel handling used oil. See the appendix.



Keep these records in your files.



Used Oil Recycling Record[®]

Forest Service Unit: _____ Location: _____

| Date | Volume of Used Oil | Where Recycled/Other Location, EPA ID# ⁽¹⁾ |
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Notes:

1. Keep this information on file with your Area Environmental Recordkeeping Unit.
2. If you had a transporter pick up your used oil, make the transporter's name and EPA identification number, and the destination of the used oil and the destination facility's EPA identification number.
3. If you did not send oil to a recycling center, describe your transportation mode, the gallonage, or use other record above you took for the used oil recycling.

Any questions? Contact your Forest or Area Hazardous Waste Coordinator for assistance.

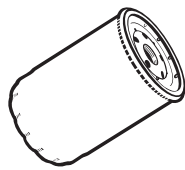
METS 30250-010

Sample recordkeeping form for recycling used oil. See the appendix.



Used oil filters are a common automotive servicing waste. If you follow a few simple rules, you can avoid regulatory concerns and ensure environmental protection. *All* used oil filters must be punctured and drained while hot, or crushed to remove residual used oil. Drained or crushed oil filters can be discarded in the trash, but it would be better to collect them for scrap metal recycling. This guideline provides some pointers on managing your used oil filters.

Used Oil Filters



Oil Filter Changes

Draining Used Oil Filters

Immediately after removing a used oil filter from a vehicle, puncture the dome, drain the filter while the oil is still hot, and crush or dismantle the filter. The objective is to remove all residual used oil from the filter.

Do NOT throw used oil filters in the trash unless they have been properly drained.



Be sure to collect *all* drained used oil from the filters in your used oil collection units; see the *Used Oil* guideline (page 19).

Recycling Used Oil Filters

To conserve natural resources, consider recycling all used oil filters as scrap metal.



Used Oil Filter Collection

If you collect used oil filters for recycling, be sure to use a drum that will not leak, and mark the drum *USED OIL FILTERS*. Use secondary containment (such as a metal pan) to guard against leakage.