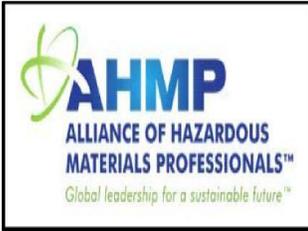


# The Hazardous Materials Manager

EASTERN WASHINGTON CHAPTER OF THE ACADEMY OF CERTIFIED HAZARDOUS MATERIALS MANAGERS  
NEWSLETTER



## Executive Committee's Corner

Welcome to spring and the new year. We are looking forward to the warmer weather.

EWC continues to try to improve our organization. We really want to promote our profession, share our expertise, and serve our communities. EWC would like to know if you have any ideas such as what activities you would like to see our Chapter organize.

So far this year (in February), we held the hazardous materials overview course at the HAMMER facility in Richland. We are very grateful to the many subject matter experts that provided their time and excellent knowledge to support this event.

In March, we provided two winning students a cash award at the Mid-Columbia Science Fair.

Also, be sure to keep an eye out for our upcoming field trip in April. This event will give us the opportunity to learn about waste water treatment and enjoy a wine tasting at the new Columbia Gardens Urban Wine and Artisan facility in Kennewick.

Hope to visit with you soon!

## Upcoming AHMP National Event

Environmental, health, safety and security (EHS&S) industry professionals meet each year to learn about the latest developments in the management of hazardous materials. The conference includes a comprehensive technical program; numerous networking opportunities; an awards recognition program; conference workshops; an exhibit hall showcasing the latest products, services, and resources; and a full-scale emergency response scenario.

This is a great chance to have fun and network with your peers!



**AHMP 2018 National  
Conference  
August 26-29, 2018  
Grand Sierra Resort  
Reno, Nevada**

### Eastern Washington Chapter of the Academy of Certified Hazardous Materials Managers

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<http://www.ewcachmm.org>

#### Current Officers:

President: Andrea Hopkins  
Vice President: TBD  
Secretary: Roni Ashley  
Treasurer: Chuck Mulkey

#### Committee Chairs:

Professional Development: Roni Ashley  
Membership Development: TBD  
Public Relations & Awards: Scot Adams  
Government Liaison: Harold Tilden  
Education: Andrea Prignano  
Web Master: Matthew Wenz  
Newsletter: Roni Ashley

#### Past Presidents:

2017– Andrea Hopkins  
2016– Chuck Mulkey  
2015– Roni Ashley  
2014 – Wade Winters  
2013 – Roni Swan  
2012 – Chuck Mulkey  
2011 – Russ Johnson  
2010 – Mike Schmoltdt  
2009 – Robbie Tidwell  
2008 – Mark Riess  
2007 – Andrea Prignano  
2006 – Robbie Tidwell  
2005 – Michelle Y. Mandis  
2004 – Chuck Mulkey  
2003 – R. Terry Winward  
2002 – Rampur Viswanath  
2001 – Stan Jones  
2000 – Roni Swan  
1999 – Chris Brevick  
1998 – Robert Newell  
1997 – Delores Lutter  
1996 – Terry Ostrander  
1995 – Bill Holstein  
1994 – Brian Dixon  
1993 – Bruce Vesper

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## Mid-Columbia Regional Science Fair Awards 2018



EWC provided awards to students at the Mid-Columbia Regional Science Fair on March 10<sup>th</sup>. Hundreds of Eastern Washington students, in grades 6 through 12, displayed their projects at the Columbia Center Mall, in Kennewick, WA from March 8 – 10<sup>th</sup>. Projects entered into the fair include students from any public or private school in the Mid-Columbia region of Washington and Northeastern Oregon.

The quality of their projects was outstanding and the EWC winners were evaluated on established criteria corresponding to the mission of the EWC. That mission includes projects focused on areas such as environmental, waste management, safety, industrial hygiene, education, analytical services, and/or engineering. This year's Science Fair winner's received a certificate and a check for \$100. This year's winners are below:

- Thai See; West Valley Jr. High School  
Topic- *How Much Arsenic Remains in Pesticide Contaminated Soil?*
- Elizabeth Ruldo-; Sunnyside High School  
Topic- *Enhancement of Respiratory Masks Using Plant Medicated and Nanoparticle Compounds.*

## Aerosol Cans

From: Roni Ashley, PMP, CHMM, CM



We use aerosol cans around the house for everything from touching up patio furniture, to dusting furniture, to making the air (or people) smell better. You can find them on nearly every jobsite, in most work vehicles, and in offices. They are small and easy to ignore. But when they explode or depressurize incorrectly, they can be deadly. Aerosol cans are widely used for dispensing a broad range of products (e.g., paint, disinfectants, sealants, hairsprays, insecticides, air fresheners, etc.). It is easy to understand why people do not think twice about using the aerosol and tossing it aside, when the task is complete, or the can is empty.

Aerosol spray is a type of dispensing system which creates an aerosol mist of liquid particles. They can be in a can or bottle that contains a useful material with a propellant under pressure. When the container's valve is opened, the material is forced out through a small hole and emerges as an aerosol or mist. As propellant expands, only some propellant evaporates inside the can to maintain a constant pressure. Outside the can, the droplets of propellant evaporate, leaving the material suspended as very fine particles or droplets.

Aerosol cans are normally manufactured from thin sheets of steel. The products they hold are highly pressurized with a number of types of hydrocarbon propellants, from carbon dioxide or butane or propane. In recent years, some scientists and environmental activists have linked chlorofluorocarbon (CFC) propellants to decreases in the planet's ozone layer.

Most manufacturers have shifted to propellants that are thought to be less damaging to the atmosphere.

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## Hazards to workers

Workers face three general types of hazards when working with aerosol cans. The first of these is the pressurization. As long as the can and the dispensing device remain intact, aerosol cans are safe. But any number of problems, such as a puncture, a faulty valve, excessive temperatures, or corrosion can result in unintended depressurization. In the most severe cases, aerosol cans may explode, burning nearby workers and showering them with steel shrapnel.

The second hazard is the actual product being dispensed by the can. Often, these products are inherently hazardous, such as in the case of insecticides. Others may contain hazardous substances, such as the concentrated solvents found in some paints or cleaners. In fact, some cans that are partially empty may be legally considered to be hazardous wastes. Finally, if either the propellant or the product it delivers is flammable, the aerosol can create a fire hazard.

## Safe work practices

As with most hazards, the first steps in reducing the dangers associated with aerosol cans is to determine whether they are really needed on the jobsite. If the task can be accomplished without the use of aerosol cans, workers will not have to contend with the hazards. Other forms of the material may be available. Or, refillable spray bottles or air-powered equipment may be available.

If workers do use aerosol cans, they should be familiar with the Safety Data Sheets (SDSs) for the material and use the cans according to directions. Personal protective equipment or additional ventilation may be required.

Aerosol cans should always be stored in dry areas where they will not be exposed to excessive temperatures. As the temperature rises, pressure in the can will increase and may lead to explosions. Because car and truck interiors can become very hot in sunlight (even during the winter months), vehicles are generally not a safe location for even temporary storage.

## Emptying aerosols of hazardous waste and disposal

To make an aerosol can “RCRA empty,” the generator must remove all liquid that can be removed by normal means (e.g., spraying out the contents of the product) and have no more than one inch or 3% by weight of residue remaining. However, if the contents in the aerosol are RCRA listed waste, generators must follow different standards to empty the container. Hazardous waste containers that contain acute hazardous wastes (and/or extremely hazardous waste containers in the state of Washington) must be triple rinsed before they are considered “RCRA-empty.” Since rinsing the inside of an aerosol can is impractical if not impossible for generators, acutely hazardous P-list residue in an aerosol can is regulated as hazardous waste and is not eligible for exclusion under the RCRA rules for empty containers. What about the second type of potential hazmat in every aerosol can—the propellant? A container that has held a hazardous waste that is a compressed gas (e.g., propane) is empty when the pressure in the container approaches atmospheric.

The aerosol can that is not RCRA-empty will have to meet the standards of the 90-day, 180-day, or satellite accumulation rules. Aerosol mismanagement is a frequent cause of RCRA non-compliance. To avoid this problem, one best management practice is to store aerosol cans to determine if they can be recycled.

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An aerosol when found to be inoperative or malfunctioning may qualify as hazardous waste or Dangerous Waste (in the state of Washington). Cans that are completely empty of both propellant and product are not considered to be hazardous waste (and may be recyclable). If you are able to empty the aerosol can before disposal, they are no longer hazardous waste under RCRA. That said, when you manage hazardous waste, the word “empty” has a meaning that differs in major ways from the standard, everyday definition. Making a container “RCRA-empty,” is more complex than deciding if a gallon of milk is empty or not.



If cans that contain hazardous wastes are to be disposed, they should be placed in a special closed container with the required markings indicating that the waste is hazardous. The labeling should also indicate that aerosols containers are stored and the date the container began to be used to store the aerosols. Keep records of when and how the waste was disposed or recycled.

## Proposed Rule to Add Aerosol Cans to the Universal Waste Regulations

From: the Environmental Protection Agency (EPA)

On March 6, 2018, the EPA issued a proposed rule to add hazardous waste aerosol cans to the category of universal wastes regulated under the federal Resource Conservation and Recovery Act (RCRA) regulations entitled *Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations*. EPA cites as authority for this change Sections 2002(a), 3001, 3002, 3004, and 3006 of the Solid Waste Disposal Act, as amended by RCRA and the Hazardous and Solid Waste Amendments Act (HSWA).

EPA indicates the streamlined Universal Waste regulations are expected to:

- Ease regulatory burdens on retail stores and other establishments that discard aerosol cans by providing a clean, protective system for managing discarded aerosol cans;
- Promote the collection and recycling of aerosol cans;
- Encourage the development of municipal and commercial programs to reduce the quantity of these wastes going to municipal solid waste landfills or combustors; and
- Result in an annual cost savings of \$3.0 million to \$63.3 million.

Hazardous waste aerosol cans that contain pesticides are also subject to Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requirements, including compliance with the instructions on the product label. EPA anticipates that this 2004 FIFRA determination would not be affected by the proposed addition of hazardous waste aerosol cans to the universal waste rules.

EPA issued a determination that puncturing aerosol pesticide containers is consistent with the purposes of FIFRA and is therefore lawful pursuant to FIFRA section 2(ee)(6) provided that the following conditions are met:

- The puncturing of the container is performed by a person who, as a general part of his or her profession, performs recycling and/or disposal activities;
- The puncturing is conducted using a device specifically designed to safely puncture aerosol cans and effectively contain the residual contents and any emissions thereof; and

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- The puncturing, waste collection, and disposal, are conducted in compliance with all applicable federal, state and local waste (solid and hazardous waste) and occupational safety and health laws and regulations.

## Transportation Safety Board Figures Show Rise in Serious Rail and Pipeline Accidents in 2017 –Global News (IHMM)

Serious accidents involving both rail and pipeline transport of dangerous substances like crude oil and gas increased in 2017 over the previous year, according to statistics compiled by the Transportation Safety Board.

Of the total 1,090 railway incidents that were serious enough to be deemed “accidents” last year, 115 involved dangerous substances, including five accidents where the substances leaked. That’s up from 100 accidents involving dangerous goods in 2016 that included only two involving leaks.

Similarly, the number of pipeline accidents went up last year to five from zero in 2016. One of those accidents resulted in the February 2017 spill of nearly 200,000 liters of crude oil condensate from an Enbridge pipeline at an industrial site near Edmonton.

Jean Laporte, the Chief Operating Officer of the Transportation Safety Board, said his agency will be looking in the coming months into why serious railway accidents have gone up. We’re going to dig a bit deeper in the next little while to understand why and see if there’s anything that needs to be analyzed further in the coming year. As for the increase in pipeline accidents, Laporte is less worried at this time. He believes the main reason they saw a spike in accidents was due to a rainier year, which caused more soil erosion that exposed pipelines to disruptions and spills. We’re not particularly concerned about this increase at this time,” said Laporte.

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## Home Depot Settles Hazardous Waste Allegations –AP, Sacramento, CA

Officials say Home Depot will pay \$27 million to settle allegations in California that the retailer illegally disposed of hazardous waste and tossed customer records without first rendering personal information unreadable. The state’s attorney general, Xavier Becerra, said Thursday that inspections of Home Depot trash bins over a two-year span uncovered the violations.



The company said in a statement that it will work with California in its commitment to responsible waste disposal. Becerra said the home improvement chain will pay about \$16 million in civil penalties, \$9 million toward environmental protection and compliance, and nearly \$2 million to cover costs.

Officials say Home Depot outlets failed to properly manage the disposal of aerosol cans, batteries, electronics, paint and other items, in addition to customer information.