



**Minnesota
Pollution
Control
Agency**

This fact sheet is intended as guidance for very small quantity hazardous waste generators – those businesses generating 220 pounds per month (about ½ drum liquid) or less hazardous waste.

Step 8: Plan for Emergencies

Emergency planning for very small quantity hazardous waste generators

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Environmental Concerns

No business ever intends to release hazardous waste, but unexpected events do occur. For this reason, it is important to plan and prepare for hazardous waste-related emergencies before they happen.

The best preparation is prevention. Do all you can to reduce your risk for unexpected events: train employees to do their jobs correctly and maintain good housekeeping standards at your business. Then, with a good plan, proper equipment and employees trained to quickly respond to an incident, you can lessen your cleanup costs, the impact on employee health and the environment, and future liability for your business.

Keep in mind — Occupational Safety and Health Administration (OSHA) regulations require employers to plan for emergencies that could threaten worker safety. When planning for the possibility of a chemical spill, you will need to determine what size and type of spill you can handle routinely and what size and type of spill becomes an emergency. Train employees in spill cleanup procedures for routine chemical spills. If an emergency spill (based on size or chemical type) occurs, specially trained spill-response workers must handle the emergency. It is usually not feasible for small employers to maintain their own staff of emergency spill-response workers. Your plan for emergency chemical spills will likely involve evacuating employees from the spill area and calling for outside chemical spill-response assistance.

In addition to the hazardous waste requirements discussed below, other

agencies, such as OSHA, may require proper storage of products at your site to prevent incidents. This proper storage may include:

- storing products in containers appropriate to the contents
- ensuring all product containers are correctly labeled
- storing combustible and flammable products in fire-preventing cabinets or buildings

Also, ensure that you are not exceeding maximum flammable material storage limitations for any type of occupancy established under Minnesota State Fire Code. When calculating the flammable material limit for a specific occupancy, be sure to include both product and waste materials.

You can also reduce your risk of incidents by voluntary actions such as:

- reducing the danger of materials on site through product substitution
- maintaining the minimal necessary inventories of both product and waste necessary for your operations
- maintaining product and waste inventories to identify leakage
- using fill indicators for tanks and containers where content levels are not visible to employees.

Hazardous Waste Rules do not require Very Small Quantity Generators of hazardous waste (VSQGs) to document response arrangements with local emergency services, such as fire protection and hospitals. However, doing so can ensure that local emergency services understand the potential risks associated

with your business and how to best respond to an emergency. Depending on your business, response arrangements may also be required under OSHA or another agency.

Hazardous Waste Requirements

1. Establish and follow procedures to minimize the possibility of incidents that could threaten human health and/or the environment.
 - Close all hazardous waste containers.
 - Provide adequate aisle space in hazardous waste storage areas to inspect and remove containers and allow employees to respond to emergencies.
 - Protect hazardous waste storage areas from inadvertent damage from equipment or unauthorized personnel.
 - Seal floor drains near stored hazardous waste to prevent releases.
 - Conduct required weekly inspections of hazardous waste storage areas.
2. Have the following emergency equipment available:
 - An internal communications system capable of alerting personnel of emergencies. (For small shops, the human voice may be sufficient. For larger shops, an intercom, loudspeaker, alarm system or telephone may be necessary.)
 - Immediate access to communications for employees working with hazardous waste. Examples of how to comply include: installing an alarm call button or telephone in a storage room, training employees to carry hand-held radios or cellular telephones, or ensuring employees use a 'buddy system' whenever working with hazardous waste, in which an employee working with hazardous waste is always within voice contact with another employee outside of the hazardous waste area. A fire alarm 'pull' does not meet this requirement. If you install or intend use of potential ignition sources, such as telephones or radios, in any storage area potentially containing a flammable atmosphere, you may be required to use intrinsically safe equipment.
 - A telephone or radio available to employees on the site to contact outside emergency services.
 - Spill response equipment appropriate to the type and amount of wastes accumulated at the site.
 - Decontamination equipment appropriate to the wastes accumulated at the site. OSHA regulations

may specify equipment type, number, and locations.

- Portable fire protection equipment (such as fire extinguishers). The Minnesota State Fire Code may specify equipment type, number, and locations.
 - Water at adequate volume and pressure to meet fire protection needs. The Minnesota State Fire Code may specify volume and pressure requirements for your site.
3. Maintain and test all emergency equipment according to the manufacturer's instructions to ensure proper operation in an emergency.
 - Ensure fire protection equipment is in operating condition and accessible at all times.
 - Ensure fire protection systems, including all portable fire extinguishers, are inspected and tested at least annually by a competent licensed individual.
 4. If a release of any substance, including hazardous waste, may cause pollution of the air, land or water, report the incident immediately to the Minnesota Duty Officer (available 24hours/day) at the appropriate number below. When reporting, be prepared to give the following information:
 - name and phone number of the company contact person or person reporting the spill;
 - quantity of waste released;
 - type of waste released;
 - date and time of release;
 - health hazards associated with the material released;
 - any injuries resulting from the release; and
 - name, address and Environmental Protection Agency (EPA) identification number of the site.

State spill notification requirements

If you spill a hazardous waste, hazardous material or a petroleum product in Minnesota, call your local authorities first if there is a threat to life or property. If there is a public safety or environmental threat or if state agency notification for reportable spills is required, call the Minnesota Duty Officer. When federal notification is required, call the National Response Center.

More information

Your Twin Cities metropolitan county and the Minnesota Pollution Control Agency have staff available to answer waste management questions. For more information, contact your metropolitan county hazardous waste office or the MPCA office closest to your county.

The Minnesota Technical Assistance Program (MnTAP) has staff who are able to help you find ways to improve efficiency and reduce waste.

Metro County Hazardous Waste Offices

Anoka	763-422-7093
Carver	952-361-1800
Dakota	952-891-7557
Hennepin	612-348-3777
Ramsey	651-266-1199
Scott County	952-496-8475
Washington County	651-430-6655
Web sites	www.co.[county].mn.us

Minnesota Duty Officer (24-hr number)

Greater Minnesota	1-800-422-0798
Local	651-649-5451
TDD	651-627-3529
FAX	651-296-2300
Web site	www.dps.state.mn.us

Minnesota Pollution Control Agency

Toll free (all offices)	1-800-657-3864
Brainerd	218-828-2492
Detroit Lakes	218-847-1519
Duluth	218-723-4660
Mankato	507-389-5977
Marshall	507-537-7146
Rochester	507-285-7343
St. Paul	651-296-6300
Willmar	320-214-3786
Web site	www.pca.state.mn.us

Minnesota Technical Assistance Program

Toll-free	1-800-247-0015
Metro area	612-624-1300
Web site	www.mntap.umn.edu

National Response Center

Toll-free	1-800-424-8802
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For questions regarding employee protection and OSHA requirements, contact MnOSHA at (651) 284-5005, or visit the Web site: www.dli.mn.gov/mnosh.asp

For questions regarding the Minnesota State Fire Code, contact the State Fire Marshal Office at (651) 201-7200, or visit the Web site: www.dps.state.mn.us/fmarshal/fmarshal.html