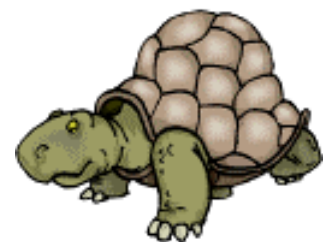


MANAGEMENT GUIDELINES FOR INDIANA HOUSEHOLD HAZARDOUS WASTE PROGRAMS



Prepared by the:

**Indiana
HHW Program
Guidelines Committee**



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Table of Contents

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	Page
Introduction	3
◆ Contributors & Acknowledgments	
I. Program Basics – Safety #1 Priority	5
II. Training	8
III. Safety Plans	11
IV. Proper Disposal Issues	13
V. Request for Proposal	15
VI. Local Appropriate Public Access	22
VII. Resources	25
VIII. Common Household Hazardous Wastes	27
IX. Prohibited Material Exchange List	31

Introduction

This publication, “Management Guidelines for Indiana Household Hazardous Waste Programs,” is meant to serve Household Hazardous Waste (HHW) program managers and those considering the implementation of a Household Hazardous Waste program as a guide to good program operation and management. This document is intended to be a compilation of best management practices and a reference tool for further information.

The Indiana HHW Program Guidelines Committee developed the guidelines presented in this document. The topic of “What makes a good household hazardous waste program?” was the subject of a session at the 2002 Indiana Recycling Coalition 13th Annual Conference. Participants in the IRC session continued to meet to discuss HHW program management and this document is the result of those discussions. We encourage feedback and suggestions to make this a better working document for professionals in the HHW field.

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I. Program Basics - Safety #1 Priority

A main goal of household hazardous waste (HHW) programs is to provide and promote safe, effective, and efficient disposal/recycling/reuse of common household chemicals and products for the general public in a particular service area. A major hallmark of a good HHW program is how safe the program is for the employees and the public. The following are some important guidelines to have in place and keep in mind for operating a safe and effective HHW program.

1) Employee Training

Proper training is strongly recommended for all employees involved in HHW program operation. Employees need to have a minimum of Hazard Communications (HazCom) training including an understanding of the use of Material Safety Data Sheets (MSDS) and hazard evaluation. All training courses must be performed by a qualified and certified trainer and documented. On the job training is also important. New employees may need mentoring or on site supervision for a period of time. Certain chemistry education courses may also be helpful.

2) Job Hazard Analysis

Job Hazard Analysis (JHA) is an important part of Hazard Communication. Job-related injuries happen all too often in the workplace. Most of the time these injuries happen due to employees not being trained in proper procedures. One way to prevent workplace injuries is to establish proper procedures and train all employees in safe and efficient work methods.

Establishing proper job procedures is one of the benefits of conducting a JHA. This means carefully studying and recording each step of a job, identifying existing or potential job hazards (both safety and health), and determining the best way to perform the job to reduce or eliminate these hazards. JHAs must be performed for specific duties and be on file. JHAs must be periodically reviewed and revised as needed. (Information taken partly from OSHA 3071)

3) Availability of Safety Equipment

All employees and visitors must have access to personal protection or safety equipment before entering a hazardous area, or before performing certain job procedures. The type of personal protection equipment an employee uses is in direct correlation to how hazardous a particular situation or chemical area is. Safety equipment should be visible and properly marked. Training on proper use of equipment is required for all employees, and should be included in any hazardous waste course.

4) Meet OSHA Standards

It is not enough to know the Occupational Safety and Health Administration (OSHA) standards—they must be met. Compliance with all federal, state, and local laws and ordinances is also required.

5) Informational Signs and Traffic Flow

Signs that inform the public about operational procedures are important. Signs must indicate hours of operation, penalties for abandoning waste, and where to park. One-way traffic is desirable and should be marked accordingly. Don't assume the customers will know what to do or where to go.

In addition, appropriate signs are also needed in your work and storage area for employee's benefit. Signs for equipment, chemicals, first aid station, etc. All signs must be highly visible with appropriate sized lettering. No smoking signs, in particular, need to be seen by all.

6) Materials/Tools

All needed materials, operational equipment and tools should be available to employees in order to perform job responsibilities. Shortcuts, improper or broken equipment spells disaster. Contact your equipment supplier or HHW disposal contractor if you need help. Appropriate tools are of special importance to protect workers from injury and exposure.

7) Storage for HHW and/or Supplies

All storage facilities must be in compliance with the Building and Fire Code. Be sure to examine the volume of flammables to be stored on site. This is of particular importance when dealing with flammable and combustible chemicals whether solids, liquids, or gases. Plenty of space for storage of supplies and other miscellaneous items is important. Always leave room in your program for future growth.

8) Partnerships with Local Authorities

Local Emergency Planning Committees (LEPC) and fire departments should be aware of your program, the types of materials you commonly receive and store on site, and be provided with emergency contact information for the site. Contact number for these authorities should be accessible to all employees for use in an emergency. Make an invitation to fire and police department representatives to tour your facility and ask them for their input.

9) Limited Public Access to Materials

Secure materials after they have been accepted. Examine contents of material away from public acceptance area. Allow non-employees in public drop off and reuse areas only. Limit your liability and potential for trouble.

10) Materials NOT Accepted

Post and advertise a list of materials that are NOT accepted at your facility. Make sure employees know what materials you DO and DO NOT accept. This will limit potential problems. Train employees in the proper and polite way to reject those materials before they are accepted into the facility; and also to inform customers of other alternatives of what to do with materials that are NOT accepted.

11) Reuse Area

Determine if a reuse area is feasible for your program. Set a policy for what materials will be available for reuse by the public. Ensure the public signs a legal waiver denying any responsibility for the material by your organization. Post signs indicating that materials are "as is" and should be used as per manufacturer's instructions. Only put out material with manufacturer's labels still intact. Do not put out materials that have been banned, discontinued, or that are unknown. Define acceptable limits on materials the public can take.

12) Staging Area

Stage public drop off area near to reuse area to encourage “shopping”. Keep residents in a one way flow if possible and possible time limits to allow others time to “shop”. Allow enough room at drop off area for paperwork. Clearly define areas where the public is allowed and areas that are “employees only” to limit possible accidents and liability. Proper signs will help alleviate this problem.

13) Process/Separation Area

Employees need space to process, separate and organize materials away from public drop off area. Make sure the proper equipment and supplies are available to process all materials received into the facility that day, if possible.

14) Standard Operating Procedures (SOP)

HHW programs should develop written Standard Operating Procedures for dealing with dangerous situations (such as handling unknowns) or other procedures that require standardization.

15) Waste Acceptance

HHW programs should develop standard procedures for accepting waste. Staff should attempt to learn as much as possible about the waste when it is dropped off, especially materials that are brought in unmarked containers. Staff should examine containers at the time materials are dropped off to determine if any containers leak; leaking containers should be immediately placed in an over pack. Unknown materials should be labeled and segregated from other waste. Program participants should be required to complete a household certification form when dropping-off waste. Conditionally Exempt Small Quantity Generators (CESQG) should fill out a certification form to verify their CESQG status.

16) Customer Service

Be courteous and friendly and always try to help the public. Try to answer their questions, give potential solutions to their problems, and give accurate information. Avoid confrontation if possible. If confrontation occurs or persists, refer to the manager or supervisor. If a confrontation becomes uncontrollable, contact proper authorities.

17) Education

A good opportunity to educate residents and businesses about being good consumers of chemicals with hazardous properties is when they are dropping off waste. Educating residents and businesses will result in less waste being disposed of through the HHW program and less cost for the program or businesses. Repeat customers are not a good thing for a HHW program. Employees that accept waste should be trained and aware of waste management practices, source reduction and hazardous waste rules. Publications should be available on HHW source reduction, waste management and the hazardous waste rules particularly pertaining to Conditionally Exempt Small Quantity Generators.

18) HHW Contractor Needs

Provide a contact list of local authorities to the company that picks up your HHW materials for recycling and disposal. This should be done whether it is for HHW pick up or a single day event. Provide a map to the nearest emergency department or hospital.

II. Training

Training is a critical component to any HHW program. All employees must be aware of the materials they will be handling and what to do in an emergency. The following is not an exhaustive list of recommended training, but it is a good start.

Select a qualified trainer

- a) Ask for qualifications
- b) Ask for experience
- c) Ask for and check references
- d) Identify what level of training is needed for your program
- e) Seek out a trainer who is willing to customize the training to your program needs

Training for all employees

The following training is recommended for all employees, regardless of job function:

1) First Aid

29 CFR 1810.151 states that the employer shall ensure the availability of medical personnel for advice and consultation on matters of health. In the absence of an infirmary, clinic, or hospital in near proximity to the workplace that is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid.

- a) Adequate first aid supplies shall be readily available.
- b) Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.
- c) First Aid training is available from the American Red Cross. Your local hospital and/or fire department may also offer first aid training.

2) Cardiopulmonary Resuscitation (CPR)

CPR training is available from the American Red Cross. Your local hospital and/or fire department may also offer CPR training.

3) Bloodborne Pathogen Exposure

- a) Bloodborne pathogen means pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV).
- b) 29 CFR 1910.1030 requires a Bloodborne Pathogen Exposure Control Plan. An effective plan will outline the types of materials that may contain pathogens and control measure to prevent exposures.

- c) Bloodborne Pathogens Exposure training is available from American Red Cross. Training may also be available from your local hospital or your insurance carrier.

4) Portable Fire Extinguisher (29 CFR 1910.157)

- a) The requirements of this section apply to the placement, use, maintenance, and testing of portable fire extinguishers provided for the use of employees.
- b) Portable Fire Extinguisher training (or information regarding how to get the training) is available from your local fire department.

5) Hot /Cold Training

- a) Hot or cold weather can seriously affect the health of employees working in those environmental conditions.
- b) Hot and Cold (Heat Stress and Hypothermia) training is available from American Red Cross, your local hospital, or your insurance carrier.

Job-specific training

The following training may be necessary depending on the specifics of your program. Most training is available from businesses or other organizations. This list may not be all-inclusive.

1) 8-Hour First Responder - Awareness Level (OSHA)

- a) OSHA requires 8 hours of specialized training for employees who must undertake response actions to protect people, property or the environment from the effects of a chemical release, without trying to stop the release.
- b) The training focuses on defensive measures that contain or control the release from a safe distance without risk to personal safety.
- c) This level of training is recommended for all employees who interact with HHW programs.

2) 24-Hour HAZWOPER (OSHA) -

- a) 24-hour HAZWOPER training includes most topics from the 40-hour training described below.
- b) This level of training is recommended for HHW program managers and workers.

3) 40-Hour HAZWOPER (OSHA)

- a) The 40-hour course is designed for individuals involved in hazardous waste operations, including site investigation, clean up and treatment operations, where potential exposure to regulated hazards exist. The topics covered in the 40-hour course include chemical and physical hazard recognition, hazard controls, selection of personal protective equipment, air monitoring, respiratory protection, site control, decontamination, and an introduction to emergency response.
- b) This level of training is recommended for employees who are involved in emergency response, and for those in situations that require personal protective equipment (PPE) above Level C.

4) 8-Hour Annual Refresher (OSHA)

- a) All people with 24-hour or 40-hour HAZWOPER certifications must have 8 hours of refresher training each year to keep their certification valid.
- b) Annual refresher training should be available from your original HAZWOPER trainer, and may also be offered at the North American Hazardous Materials Management Association's (NAHMMA) annual conference.

5) Personal Protective Equipment (PPE)

- a) 29 CFR 1910.132 states that protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation, or physical contact.
- b) PPE training should be included as part of any HAZWOPER training, and can be offered as a separate training to those who do not take a HAZWOPER training.

6) Respiratory Protection

- a) 29 CFR 1910.134 states that: the employer shall provide respirators when such equipment is necessary to protect the health of the employee. The employer shall provide the respirators, which are applicable and suitable for the purpose intended. The employer shall be responsible for the establishment and maintenance of a respiratory protection program, which shall include the requirements outlined in paragraph (C) of this section.
- b) Respiratory Protection training should be included as a part of any HAZWOPER training, and may be offered as a separate training to those who do not take a HAZWOPER training.

7) Explosives

- a) HHW programs generally do not accept explosives. Most programs instruct residents NOT to bring the explosives to the HHW program but to call the police or bomb squad.
- b) Training may be obtained from local police or Indiana State Police. NAHMMA's annual conference may also offer training on explosives and reactive chemicals.

8) Identifying Unknowns

- a) Employees responsible for accepting waste from the public and packing HHW for transport should participate in this training
- b) HHW programs should develop Standard Operating Procedures for dealing with unknowns.
- c) Unknown identification training is available from your waste contractor.

9) Acutely Hazardous Waste 40 CFR 261.33

- a) This training is appropriate for employees who will handle waste from Conditionally Exempt Small Quantity Generators (CESQGs). CESQGs are non-household generators of hazardous waste that generate less than 220 lbs. per month of hazardous waste and less than 2.2 lbs. per month of acutely hazardous waste, and may store less than 2,200 lbs. of hazardous waste.

- b) HHW programs should develop Standard Operating Procedures for dealing with acutely hazardous waste.
- c) Training may be obtained from your waste contractor.

10) Clandestine Drug Labs

Training may be obtained from the Indiana State Police (800-582-8440) or at the NAHMMA annual conference.

11) Powered Industrial Trucks (forklifts)

- a) 29 CFR 1910.178 contains safety requirements relating to fire protection, design, maintenance, and use of forklifts and other specialized industrial trucks powered by electrical motors or internal combustion engines.
- b) Employees who work with or around this type of equipment should participate in the training.
- c) Powered Industrial Trucks training usually may be obtained locally. Otherwise check with your HHW contractor or government entity.

12) Mercury

- a) Employees who handle mercury at any time should be trained to handle it safely as well as clean up spills.
- b) Contact Indiana Department of Environmental Management, Office of Pollution Prevention and Technical Assistance at 1-800-988-7901 for information about mercury training.
- c) IDEM has information about mercury on its web page, including a Mercury Spill Information and Cleanup Guidance: <http://www.in.gov/idem/mercury/index.html>.

13) DOT 49 CFR 172.704 (Subpart H, sometimes referred to as HM – 181)

- a) DOT 49 CFR 172.704 is the part of Code of Federal Regulations dealing with the transportation of hazardous waste. People should take this training if they:
 - i) Offer a hazardous material for transportation,
 - ii) Are involved in the transportation of a hazardous material, or
 - iii) Label packages that are transported.

14) OSHA 30 Hour Industrial Safety

- a) The OSHA 30-hour course in general industry will teach employees how to utilize and understand the OSHA general industry guidelines.
- b) After participation in this class, employees will be able to successfully utilize the 29 CFR 1900-1910 manual to locate OSHA standards, policies, and procedures.

III. Safety Plans

OSHA requires that the following safety plans are in place and that all employees are trained accordingly:

1) Job Hazard Analysis (JHA, OSHA)

- a) A job hazard analysis involves carefully studying and recording each step of a job, identifying existing or potential job hazards (both safety and health), and determining the best way to perform the job to reduce or eliminate these hazards.
- b) JHAs should be performed with the assistance of employees who actually perform each job.
- c) JHAs will assist in setting standard operating procedures for your facility.

2) Standard Operating Procedures (SOP)

- a) The purpose of SOPs is to provide general safety regulations that will help to provide a safe work environment and to reduce the accident rate among employees.
- b) Employees must be trained on the SOPs for their work site.

3) Emergency Action Plan (EAP, 29 CFR 1910.38)

- a) The purpose of an emergency action plan is to protect the employees from serious injury, property loss, or loss of life in the event of a natural disaster or emergency.
- b) A natural disaster constitutes any one of the following: severe thunderstorm, tornado, or earthquake.
- c) Emergencies would constitute any one of the following: bomb threat, robbery, fire, or hazardous chemical spill.
- d) In the event of a disaster listed, this emergency action plan describes the responsibilities and actions to be taken to protect all employees.

4) Hazard Communications (29 CFR 1910.1200)

- a) OSHA has a written standard to help you and your employer gain a better understanding of the hazards associated with the chemicals used in your workplace.
- b) The standard requires your employer to transmit the information on the hazards of chemicals to you by means of a written hazard communication program. This includes lists of chemicals compiled by work area, labeling requirements, MSDS, and employees training.

5) Lockout / Tagout 29 CFR 1910.147

- a) The purpose of a lockout / tag-out program is to control hazardous energy. A good program establishes the requirements for isolation of both kinetic and potential electrical, chemical, thermal, hydraulic, and pneumatic and gravitational energy prior to equipment repair, adjustment, or removal.

Code of Federal Regulations (CFR) Citations

<u>Title</u>	<u>Citation</u>	<u>Description</u>
Labor	29 CFR.1910	OSHA Standards for General Industry
Protection of Environment	40 CFR	EPA Environmental Standards
Transportation	49 CFR	DOT Requirements

IV. Proper Disposal Issues

1) Use only licensed contractors.

- a) Request copy of Department of Transportation (DOT) registration.
- b) Request copy of Environmental Protection Agency registration (EPA - ID #).
- c) Request copies of any State registrations.

2) Contractor Insurance

- a) Request pollution liability certificates.
- b) Request vehicle insurance certificates.
- c) Verify that out of state insurance is in force in Indiana.

3) Auditing

- a) Visually inspect the facility and the equipment and processes being used.
- b) Pay attention to safety. Are employees wearing the appropriate PPE?
- c) Ask lots of questions about what you see. Make sure you understand the processes being used.
- d) Request to see any actions by OSHA and EPA against the contractor.
- e) Talk to the company's employees to get a feel for the operation.

4) Important to develop a good relationship with the contractor.

- a) Get to know the company as a whole and several representatives whom you will work with frequently.
- b) Talk to the contractor and have point(s) of contact often.
- c) Make site visits and meet the staff who will be managing your waste.
- d) Let the contractor know what is working and what is not. Discuss solutions to any problems you may have.
- e) Request a site-specific invoice if necessary.
- f) Ask if separate disposal and transportation invoices are available.
- g) Review invoices with the contractor to make sure they match their quote.
- h) Ask for names of other customers in your area. You may be able to work with them on combined or special pick-ups.
- i) Obtain an organizational chart for the contractor.
- j) Discuss how and where material will be recycled or disposed of.

5) Technical assistance

- a) Identify whom to speak with for technical assistance. Also clarify the easiest way to reach this person: fax, phone, e-mail etc...
- b) Make sure there is a plan in place to deal with "unknowns". Ask the contractor what additional information they would like about unknowns...how old?...what it was used for?...etc.
- c) Make sure it is clear how much technical assistance will be offered for "free" and what the cost will be for additional technical assistance.
- d) Have in place procedures for samples that might need to be tested. Who will take the samples and how the samples will get to the lab? Cost?
- e) Discuss any sampling techniques (pH) used to determine waste stream classification.

- f) Ask the contractor for a “cheat sheet” which classifies typical items that are accepted in permanent HHW collection programs and tox-away (one-day) days.
- g) Ask the contractor for a list of common household items that can be placed in trash or poured down the drain.
- h) Contact your local wastewater treatment plant for approval to pour chemicals down drains.
 - i) Ask about volume limitations.
- i) Ask the contractor to identify any items that they will not accept.

6) Proper packaging & packing material

- a) Clearly identify who is going to pack and label your waste. If you pack your own waste, will the contractor provide the labels?
- b) Make sure you are familiar with all DOT packaging requirements. DOT training is available if needed
- c) Remember HHW, Universal Waste, and CESQG Waste are not exempt from DOT regulations.
- d) Require the contractor to give you a list of your waste streams and examples of what should go into each waste stream.
- e) Require the contractor to give you packaging and drum specifications for each waste stream.

7) Documentation and record keeping

- a) Some states require you have an EPA ID #. Does the state where your waste is going require one?
- b) Determine what documentation the contractor requires to set up shipment.
- c) Obtain a certification of CESQG status from local businesses that bring items.
- d) Determine how the contractor will deal with CESQG waste. What documentation will the contractor require? Will the contractor require a CESQG certification from each CESQG?
- e) Determine if a manifest or bill of lading will be used. Also clarify what type of manifest will be used: non-regulated, non-hazardous, or EPA hazardous waste. The purpose of a manifest or bill of lading is to itemize the materials that make up a shipment. The itemized list serves as a shipping paper and assists emergency personnel in the event of an accident by informing them about the material in a vehicle.
- f) Determine who will sign the manifest. Either the contractor or a representative from your entity must sign it. *Your signature means your district, business, or company is the generator of the waste.*
- g) Remember to keep signed copies of manifests for each shipment. Require a copy of the manifest once the material has been received at the designated facility. This should be mailed back from the facility. Keep all of this paperwork for each shipment together. This will show the date you shipped your waste and the date it was received at the designated facility.
- h) **IMPORTANT:** require certificates of recycling or destruction from your vendor.

8) Disposal methods

- a) It is important to prioritize how your waste is disposed. Your waste could be reused, recycled, fuel blended, incinerated, treated or landfilled. It is important to communicate with your contractor the options, which best fits your program. Price and disposal philosophy should be considered when making these decisions. You may want to require that your waste is managed in the United States and not sent to another country or even overseas.
- b) Request a list of final disposal facilities, which the Contractor will use for your waste.

V. Request for Proposals

**(Statement of caution and disclaimer – This specific Request for Proposal example was designed as a tool for household hazardous waste programs. Always consult your local attorney before releasing your Request for Proposal (RFP), as local requirements may necessitate that additional sections be included).

1) District Program Background

- a) Provide potential Bidders with appropriate information about your SWMD that will enable them to adequately provide for the District’s collection and/or disposal needs. Information such as:
 - i) Population served, population density, population centers, area (square miles), number of households, number of counties in your District, and major industrial categories (such as agriculture or manufacturing).
 - ii) Historical volume and participation data.

SAMPLE:

A. QUANTITIES OF MATERIALS COLLECTED

(pounds)

	2001	2000	1999
Paint			
Oil			
Antifreeze			
Solvents			
Aerosols			
Pesticides			
Acids/Oxidizers/Corrosives, etc.			
Number of Vehicles			

2) List of the types of materials accepted

A list of the types of materials you have accepted in previous contract terms, and/or what materials a Bidder should expect to accept during this contract term.

SAMPLE LIST:

- a) Bulk Paints and Solvents (liquid)
- b) Paint Solids (heels and solidified related materials)
- c) Waste Motor Oil
- d) Waste Fuels (kerosene-gasoline-heating oil)
- e) Household Chemicals (bleaches-flammables-acids-basics)
- f) Photographic Chemicals (hobbyist)
- g) Liquids from perforation of aerosol containers
- h) Herbicides/Pesticides/Fungicides/Rodenticides (including small quantities of Chlordane and DDT)
- i) Oxidizers (pool and spa chemicals)
- j) Very Small quantities of (lab grade) acids, bases, and oxidizers. (less than 5#)
- k) Scrap fertilizers (Urea)
- l) Occasional PCB contaminated bulk waste. (From pre 1974 paint)
- m) Ethylene Glycol
- n) Mercury (elemental liquid and appliances)
- o) Lead (mostly arsenates w/some white lead paints)
- p) Small quantity of flammable solids (mostly flares, calcium carbide, gunpowder etc.)
- q) Fire extinguishers and pressure vessels (propane cylinders)
- r) Household batteries

3) List of materials contractor is not required to accept

SAMPLE LIST:

- a) Radioactive materials as regulated by DOT or the Nuclear Regulatory Commission
- b) Explosives (as defined by the Bureau of Alcohol, Tobacco, and Firearms), including organic peroxides (unstable) and picric acid
- c) Polychlorinated biphenyls (PCBs) or PCB-contaminated items (except for appliances only)
- d) Compressed gases (aerosol containers are acceptable)
- e) Dioxin (2, 3, 7, 8-tetrachlorodibenzo-dioxin, TCD) or its precursors
- f) The pesticides Kepone, Mirex, hexachlorocyclopentadiene (C-56), 2, 4, 5 trichlorophenoxy, acetic acid (2, 4, 5-T) and 2, 4, 5-trichlorophenoxypropionic acid (2, 4, 5-TP)
- g) Unstable low molecular weight ethers
- h) Biological or infectious wastes
- i) Pentachlorophenol (PCP)
- j) All Poison A compounds as listed in the Hazardous Materials of Table of 49 CFR 172.101, and all materials listed as forbidden in the Hazardous Materials Table of 49 CFR 172.101

4) Unknown wastes

Unknown wastes will be field characterized and identified to determine compatibility, DOT hazard class, and disposal methodology.

5) Dioxin precursor items

Dioxin precursor-type items (herbicides containing silvex or wood preservatives containing pentachlorophenol) are occasionally inadvertently accepted. If non-acceptable wastes are encountered, it is our recommendation that these products be used for the purpose of which they were purchased. If reuse of the product by the OWNER is not feasible, CONTRACTOR will make every effort to address concerns on a case-by-case basis. At present, there are no disposal facilities permitted to accept Resource Conservation and Recovery Act (RCRA)-regulated dioxin precursors (EPA waste codes FO20 through FO27).

6) Preferred disposal hierarchy

SAMPLE: the preferred hierarchy (in order of preference) of methods for waste treatment/disposal is the following:

1. Reuse
2. Recycling
3. Treatment/neutralize
4. RCRA/TSCA incineration
5. Land disposal

7) Contractor Requirements/ Primary and Secondary Facility Audit and Visit

- a) The Contractor must make available to the HHW program all audit records regarding their facility and any secondary facilities.
- b) The Contractor must be willing to meet at the Contractor’s facility, so the District can thoroughly observe existing operations.
- c) All secondary facilities should also be visited and audited. Secondary facilities are facilities that take waste from your contractor for final disposal, incineration, treatment or recycling.

8) Pre-Proposal Meeting requirements

The Contractor must be available, upon request by the HHW program, to perform on-site visits, receive additional instructions or answer final questions before the final contractor selection is made.

9) Submittal, Evaluation and Contract Award Procedures

- a) The RFP must clearly state the HHW program’s submittal instructions, deadlines and procedures.
- b) Be sure to include all contact and delivery instructions as well as other details regarding procedures for bid evaluation, anticipated timeline, and contractor selection.

10) Sample submittal instructions

- a) All bids must be delivered to XYZ HHW program
c/o Executive Director
Street or POB address
City, State, Zip

- b) Deadline time, such as, “no later than 4:30 PM Eastern Standard Time (EST) on Friday, March 30, 2003”

11) Bid procedures

- a) Bids must be sealed and must be clearly marked "Household Hazardous Waste Bid."
- b) One signed original copy of the bid and two (2) copies of the bid will be required.
- c) Potential Bidders are encouraged to use both sides of the paper when copying, as well as use paper made with recycled content.
- d) Any late bids will be returned unopened. Bids may be hand-delivered or delivered by the US Postal Service or by private delivery service on or before that time and date.
- e) Facsimile transmission, telephone, or Internet submittal of bids is not allowed.
- f) All bids will be opened and read aloud at a meeting of the XYZ HHW program Board, hereafter known as "the Board," at (location, address), (time), (date).

12) Sample Evaluation and Selection information

- a) In order to protect the District from liabilities associated with on-site activities, transportation and inherent Comprehensive Environmental Response and Liability Act (CERCLA) liabilities involving disposal, the Bidder shall use only EPA permitted disposal facilities.
- b) There will be no subcontracting allowed in this project without prior approval from the District.
- c) Companies that can internalize all labor, packaging, transportation and disposal services will be favored in the bid evaluation process.
- d) Contractors that transport a majority of the waste from the collection site to the site of ultimate disposition directly without passing through storage facilities will be favored.

13) All bids will be given a thorough review.

- a) Immediately following the opening of bids, a period for the evaluation of bids will occur.
- b) Bids must be valid for 90 days from the due date to facilitate the evaluation of bids.
- c) One or more of the Bidders who are judged to be qualified may be invited for selection interviews. A review committee may recommend one or more Bidders to the District, and Bidders may be required to make presentations to the District. The person who will be the Contractor's site manager for the program must attend this interview.

14) Selection of the Bidders

- a) Selection of the Bidders will be based upon, but not limited to, the following considerations and criteria:
 - i) Overall responsiveness and completeness of the bid documents
 - ii) Bidder's willingness and ability to meet the Board's service demands; provide high quality and innovative waste management services; and to abide by the conditions and requirements of the contract(s)
 - iii) Bidder's financial status and ability to finance the operation
 - iv) Bidder's demonstrated experience with similar operations and references
 - v) Bidder's ability to provide, maintain, and operate required equipment
 - vi) Bid cost in relation to services proposed

- vii) Any other considerations and information deemed pertinent by the Board for safeguarding the interests of the District
- b) Once a finalist(s) is selected, the Board should negotiate a contract(s) with the HHW Contractor providing the selected services.

15) Company History And Current Status (General information)

- a) Request a detailed summary of Bidders' qualifications, experience and company background.
- b) Request such information as: origination date and location of the company; number of employees; resumes of key personnel (direct contact people); types, number and locations of treatment, storage, disposal and service centers; background information on principles and employees (e.g. chemist, engineer); material volumes managed by the company; vendor's equipment list; preferred disposal methods and disposal outlets; references (request at least three; at least one should be an Indiana SWMD)

16) EPA or IDEM Action

Identify any past or pending EPA or IDEM action in which the company is involved. **SAMPLE:** Bidders shall disclose all notices of violations, agreed orders and fines imposed during the last three (3) years. The disclosure must include a copy of the violation and the status of the violation.

17) Financial Status

What is the current financial status of the company (e.g. is it a Fortune 500 company)? Is the company currently in bankruptcy? You should always request a financial statement.

18) Insurance

- a) Provide any minimum standard policies and insurance coverage that must be maintained by the Bidder.
- b) Consider requirements relating to Workmen's Compensation, employer's liability, general liability (bodily injury and property damage for each occurrence and in aggregate), an excess liability umbrella, environmental liability, professional liability, and sudden and accidental impairment coverage.
 - i) **SAMPLE LANGUAGE:** Prior to execution of the contract(s), the Contractor(s) shall provide the Board with copies of all insurance policies providing coverage for the work to be performed under the contract(s). The policies of insurance so provided must cover all risks expected to arise during or from performance of the contract(s). Failure to provide such insurance policies shall constitute a refusal to enter into the contract(s). Said insurer(s) shall have a minimum rating of A.
- c) The following types of insurance coverage and coverage amounts must be specifically provided and certified with no internal sublets. All contractors shall maintain in full force and effect insurance as follows:
 - i) Workers' Compensation Insurance coverage shall be kept in full force carried during the performance of this contract.
 - ii) Environmental Liability Insurance

- iii) Comprehensive General Liability Insurance, including Public Liability and Property Damage Insurance, in an amount not less than \$X,000,000.00 per claim and \$X,000,000.00 in the aggregate.
- d) Contractor shall not commence work until Contractor has obtained the required insurance and has filed an acceptable Certificate of Insurance with the District. All insurance policies shall be open to inspection by the Districts and copies of the policy shall be submitted to the Districts at the time contracts are signed.

19) Permits and Licenses

- a) Bidders must possess and assume the cost of all applicable permits and licenses required to perform as stated in the RFP and proposal.
- b) Sample language: Bidders shall provide evidence of proper licensing and good standing with the State of Indiana and Federal licensing agents. If Bidder is a corporation, provide evidence that it is organized pursuant to the laws of any state.

20) Bonding Requirements

- a) Identify to the Bidders any bid or performance bonding requirements, including specific procedural information and results of non-compliance with the District's requirements.
 - i) Sample language: Each bid must be accompanied by a certified check, cashier's check, or Bid Bond in the amount of X percent (X%) of the contract value, payable to XYZ Solid Waste Management District as guarantee that if the bid is accepted, the Bidder will execute the contract within sixty (60) days of its award. Failure or refusal of successful Bidder to enter into the contract within sixty (60) days of award will result in the forfeiture of the Bid Bond (or check) to the District as liquidated damages. Forfeiture of the security shall be the sole remedy of the District. Award of the contract may then be made to the next most qualified Bidder or the work re-advertised for bids, at the sole determination of the District.
- b) The Bid Bond of all Bidders will be held until the contract is executed. If no bid has been selected within one hundred and twenty (120) days of the opening of the bids, securities will be returned upon demand of any Bidder at any time thereafter, provided that he or she has not been notified of the acceptance of his or her bid.
- c) Each bid is to be accompanied by a certificate of insurance, evidencing the coverage set forth in the Contract Specifications and naming the District as co-insured. In lieu of the certificate, the Bidder may submit evidence that, in the event that award of the Contract is made to the Bidder, the required coverage would be in place prior to the execution of the Contract.

21) Technical Assistance

The RFP should thoroughly detail procedures taken in order to determine how materials will be disposed. Is there a Waste Analysis Plan? If so, it must be readily available to the District.

22) Reuse/Recycling Measures

Identify ways the company reuses or recycles materials that are accepted through their facilities. Willingness to work with the District in developing safe ways to offer re-use opportunities to its residents.

23) Training Program Availability

Ask Bidders to provide information regarding their ability to provide HHW training for District staff.

SAMPLE LANGUAGE: The District seeks a current fee schedule charged by the Bidder for training district employees. The Contractor shall agree to train district employees in the proper identification, testing, labeling, manifesting, bulking, and lab-packing techniques, as well as safety procedures and spill response. Assume for proposal purposes that this will require eight (8) hours of refresher training for six (6) District employees. (i.e., all employees have 40-hour OSHA HAZWOPER training)

24) Reporting/Manifesting

Specify whether the Contractor or the District will assume generator status. (also, see section on Proper Disposal, Contractor Relationships and Transportation)

25) Pricing

Availability of Volume Discounts; Bidders must note in their original bids if there are opportunities to receive discounts according to volumes of materials collected.

26) Cost Savings Options

Bidders must be willing to explore cost savings options and methods with the District.

27) “Apples to Apples”

Even if a Bidder may be submitting an alternate bid, they must submit pricing in the format required in the RFP to enable comparison with other Bidders.

Agreement Issues (Exclusivity vs. Non-exclusivity)

1) Renewal Options

There should be a specified contract expiration date along with a renewal policy.

2) Non-Collusion Affidavit

SAMPLE LANGUAGE: The undersigned says that he is the contracting party, or that he is the representative, agent, member or officer of the contracting party. That he has not, nor has any member, employee, representative, agent or officer of the firm, company, corporation or partnership represented by him, directly or indirectly, entered into any combination, collusion or agreement to receive or pay, and that he has not received or paid, any sum of money or other consideration for the execution of the contract.

Further, no person or persons, firms, or corporations has, have or will receive directly or indirectly any rebate, fee, gift, commission or thing of value on account of the contract.

3) Retention of rights

- a) Sample: The Board reserves the right to negotiate final contract conditions with the Bidder(s) who, in the sole discretion of the Board, has been determined to be the best able to perform the work in a manner most beneficial to the citizens of the District.

- b) The Board reserves the right to accept any bid in whole or in part.
- c) The Board reserves the right to reject any and all bids.
- d) The Board reserves the right to waive any irregularities in a bid.

4) Signatory (SAMPLE)

Executed by BIDDER this _____ day of _____, 2003.

Name of firm _____

Address _____

By _____ Attest _____

Title _____ Title _____

IN TESTIMONY WHEREOF, the above Bidder has hereunto set his hand this
 _____ Day of _____, 2003.

 My commission expires

 Notary Public

VI. Local Appropriate Access

1) “Regular” opportunity to participate

- a) All communities have different needs when it comes to HHW programs. However, in order to make a significant decrease in the amount of HHW in the Municipal Solid Waste (MSW) stream, consistent access is a must.
- b) What is consistent access? Depending on the community it may mean:
 - i) Permanent HHW facility open 5-6 days per week
 - ii) Permanent HHW facility open 1-3 days per week
 - iii) Recurring monthly collections
 - iv) Seasonal collections (permanent facility or recurring collections)
 - v) By appointment collections
 - vi) Tox-Away Days twice per year

2) Keep within budget constraints

- a) Find local partners at the fire department, university or college, soil and water conservation workers.
- b) How can partners make your program more efficient?
 - i) Partners might be able to provide low-cost or no-cost training.
 - ii) Partners might be able to manage some materials within their existing programs (i.e. fire departments might take fire extinguishers, colleges/universities might be able to accept some “strange” materials).
 - iii) Partners can help promote your program through their newsletters, etc.
 - iv) Work with local non-profit agencies and allow them to take some of the collected material for re-use.
 - v) Work with other entities in the county with the same goal as the District and possibly set up re-use centers at their location.

- c) Phase out non-hazardous materials such as Latex paint and Alkaline batteries. Many times this deals with priorities, policies, and economics of the program.

3) Centralized location

- a) Facility needs to be easy to find and convenient to residents. One HHW drop-off site in a remote area of the District probably is not sufficient. Permanent programs work best near population centers. Residents won't usually drive "far" for this service. Also, the more services you offer in addition to a HHW program, the farther your target audience is willing to travel.
- b) Located near where most residents do shopping and other business.
- c) Located in conjunction with recycling or trash drop-off areas.
- d) If in a multi-county area, the program needs to have more than one drop-off location.

4) Mobile locations

Combination programs can help educate residents. Collections in multiple areas spread the word and encourage more residents to participate. Combining a mobile collection (limited materials or full service) with a permanent facility or a Tox Away Day can increase access to HHW programs at a reasonable cost. Some considerations for a mobile collection program are:

- a) Determine where you will hold mobile collections. Consider access. Is it somewhere that people will be tempted to leave materials when you are not there?
- b) Determine your schedule. Will the collection happen weekly, monthly, or some other schedule?
- c) Determine what materials you will take. Some mobile programs are limited to just paint, while others take all HHW. Many mobile programs are a combination of the two. Take into consideration the type of vehicle you will use and DOT regulations for transporting materials.
- d) All safety provisions for a permanent facility apply to a mobile collection. Emergency action plans specific to each mobile collection site are necessary, including emergency numbers and a map to the nearest hospital emergency room. A cellular phone is a necessary piece of safety equipment.

5) Example of supplies you will need on hand

- a) Packing materials (drums, boxes, pails, etc.) for the HHW materials you are collecting
- b) Material handling equipment, such as pallet movers, drum dollies, two-wheel carts, etc.
- c) Safety supplies, including eye wash, gloves, safety glasses, aprons, respirators, etc.

6) Program Responsibility

- a) Be efficient and make the most with what your budget will allow.
- b) With a budget of \$200,000, offer as many services to your target audience(s) as possible without sacrificing quality. Determine what works best in your community.
- c) Continue to evaluate and re-evaluate your program. Adjust accordingly. What are others doing in your area?

7) Look for cost savings in these areas:

- a) Consider participation in regional programs that offer an “economy of scale.”
- b) Consider excluding non-hazardous materials such as latex paint and alkaline batteries.
- c) Evaluate program usage and adjust program hours accordingly.
- d) Use the free RBRC recycling program for rechargeable batteries (www.rbrc.org).
- e) Work with the Contractor in developing ways to cut cost.
- f) Determine your usage policy. Will residents of your county only be allowed to participate, or will you accept waste from anyone who comes?
- g) Look for opportunities to partner with neighboring counties for HHW collection. All agreements with other counties should be in writing.
- h) Implement user fees for certain items to help cover high costs of service. (i.e. tires and electronics)
- i) Ask the Contractor and your local wastewater treatment plant about materials that can be disposed in the trash or down the drain.
- j) Set up a donation box. Let residents know that HHW disposal may be free of charge to them, but it is not free to the District.

8) Advertising / Promotion

- a) Residents will learn some information via word of mouth, but unless you advertise and promote your HHW program, no one will come.
- b) Use newspaper and radio advertising in your community.
- c) Provide information to town offices, fire departments, and trash-haulers to share with residents
- d) Ask partners to include information in their newsletters.
- e) Ask local utilities and banks to insert a “stuffer” with monthly statements.
- f) Make yourself and the District available to the public in order to help educate the public and promote your facility. (i.e. 4-H fair and Earth Day)
- g) Working with the local Chambers of Commerce is a good way to get contact information for local business. By working with the Chamber of Commerce you will be educating both business and the public about safety issues when dealing with Hazardous waste.

9) Conditionally Exempt Small Quantity Generators (CESQGs)

- a) CESQGs are non-household generators of hazardous waste that produce less than 220 pounds of any hazardous waste per month, less than 2.2 lbs. of acutely hazardous waste per month, and store less than 2200 pounds at any time. HHW programs can legally accept CESQG waste.
- b) Determine if your program will accept CESQG waste and what types you will accept from CESQGs. Often, CESQGs have few options for proper hazardous waste disposal, or their options are cost-prohibitive.
- c) Work with your contractor to determine CESQG acceptance policies and procedures.
- d) Determine if CESQGs will be required to pay for disposal through your program. Some programs require that CESQGs pay the cost of disposal only. Other programs charge a disposal fee plus a handling fee.

VII. Resources

Indiana

- 1) Indiana Department of Environmental Management
24 Hour Spill Reporting
Office of Pollution Prevention & Technical
Assistance (www.IN.gov/idem/oppta)
800-451-6027
888-233-7745
800-988-7901
- 2) Department of Labor
Safety & Education Training
Industrial Hygiene Compliance
IOSHA –
Information (www.IN.gov/labor/iosha)
317-232-2688
317-232-1984
317-232-2693
- 3) Indiana State Board of Health
Chemical Concerns
Radiological Concerns
317-633-8554
317-633-0147
- 4) Indiana State Chemists Office
765-494-1585
- 5) Indiana State Police Hazardous Materials Hotline
800-523-2226
- 6) Environmental Management Institute (Indianapolis)
800-488-4842
- 7) Indiana Household Hazardous Waste Task Force
812-349-2867
- 8) Indiana State Fire Marshall’s Office
317-233-2222
- 9) Indiana State Police – General Information
317-232-8250

National

- 1) Center for Disease Control and Prevention (CDC)
www.cdc.gov
800-311-3435
- 2) CHEMTREC Emergency Assistance
800-424-9300
- 3) EPA Region V
www.epa.gov
800-621-8431
- 4) Superfund/RCRA Hazardous Waste Hotline
www.epa.gov/swerrims
800-424-9346

- | | |
|--|--------------|
| 5) EPA Region V 24 Hour Spill Reporting | 312-353-2318 |
| 6) Occupational Safety & Health Administration (OSHA)
www.osha.gov | 312-353-2220 |
| 7) Department of Transportation (Hazardous Materials Information Center)
www.dot.gov | 202-619-0257 |
| 8) Food and Drug Administration
www.fda.gov | 888-463-6332 |
| 9) Federal Emergency Management Agency
www.fema.gov | 202-566-1600 |
| 10) National Safety Council
www.nsc.org | 800-621-7615 |
| 11) National Institute for Occupational Safety & Health
www.cdc.gov/niosh | 800-356-4674 |

Material Safety Data Sheets (MSDS) Web Sites

www.msds-online.com
www.msdssearch.com
www.msdsprovider.net

Other Sources for Information

- | | |
|---|---------------|
| 1) North American Hazardous Materials Management Association
www.nahmma.org | 877-292-1403 |
| 2) Indiana Recycling Coalition
recyclin@in.net | 877-283-9550 |
| 3) Association of Indiana Solid Waste Management Districts (AISWMD)
aiswmd@earthlink.net | 219- 405-0825 |
| 4) National Oil Recycler's Association
www.noranews.org | 703-753-4277 |

VIII. Common Household Hazardous Wastes

CORROSIVES (ACIDS)

Boric Acid
Car Battery Acid
Copper Cleaners
Etching Solutions
Ferric Chloride
Fertilizers *
Hydrochloric Acid
Hydrofluoric Acid
Metal Cleaners
Muriatic Acid
Navel Jelly
Phosphoric Acid
Pool Acid
Sheep Dip
Sodium Bisulfate
Sulfuric Acid
Toilet Bowl Cleaners *

CORROSIVES (BASES)

Ammonia and Ammonia Based Cleaners
Battery Terminal Cleaner
Caustic Soda
Cess Pool Cleaners *
Drain Cleaners *
Household cleaners *
Lime
Lye
Oven Cleaners *
Sodium Hydroxide
Window Cleaners

EXPLOSIVES

Ammunition
Fireworks
Flares

FLAMMABLES & COMBUSTIBLES

Acetone
Adhesives *
Aerosol
Air Freshener
Alcohols
Artificial Snow
Asphalt Driveway Topping
Automotive Body Filler (Bondo) (unsolidified)
Automotive Oils
Automotive Waxes
Bar-B-Que Lighter Fluid
Benzene
Tire Black

Brake Fluid
Camphor
Chrome-Silver Polishes *
Cutting Oil
Denatured Alcohol
Diesel Fuel
Disinfectants
Duplicator Fluid
Enamel Paint (unsolidified)
Enamel/Oil Base Paint
Epoxy Paint (unsolidified)
Ethanol
Ether
Ethylene Glycol
Fiberglass Resins (unsolidified)
Fingernail Polish and Remover
Floor/Furniture Polish
Formaldehyde Solution
Formalin
Gasoline
Glues *
Grease
Household Waxes
Isopropyl Alcohol
Kerosene
Lacquer Thinner
Lacquer Paint (unsolidified)
Linseed Oil
Liquid Waxes *
Liquid Sandpaper *
Liquid Butane
Methanol
Naphtha
Oils (petroleum)
Organic solvents
Paint Thinners
Paint Strippers *
Paraffin Oil
Pentachlorophenol
Perfume
Petroleum Distillates
Plastic Roof Cement
Plastic Model Cement
Polyurethane Paint (unsolidified)
Polyurethane Cement (unsolidified)
Power Steering Fluid
Primers
Roofing Cement
Rug/Upholstery Cleaner
Sealers
Shellac Thinner
Silicone Sprays
Spot Remover/Dry Cleaning Fluids
Thinner
Tile Cement

Toluol/Toluene
Transmission Fluid
Transmission Oil
Turpentine
Varnish
Wallpaper Cement
Windshield Wiper Fluid
White Gas
Wood Filler/Putty
Wood Stain
Xylol/Xylene

ORGANIC PEROXIDE

Adhesive Catalysts
Automotive Body Filler Catalyst
Tree Root/Stump Killer

RADIOACTIVE MATERIALS

Old glow in the dark watches
Smoke Alarms

OXIDIZERS

Ammonium Nitrate
Bleach
Calcium Hypochlorite
Chlorates
Fertilizers *
Fluorine
Hair Coloring
Hydrogen Peroxide
Iodine
Nitric Acid
Plant Food
Potassium Permanganate
Sodium Hypochlorite
Toilet Bowl Cleaner with bleach

POISONS

Ant and Roach Killer
Anti-Freeze
Arsenic Compounds
Automotive Cleaners
Bacterial Pipe Cleaners
Bordeaux Mix
Boric Acid
Bug Remover
Chlordane
Chrome-Silver Polishes *
Chromium
Copper Sulfate
DDT
Diazinon
Dimethylamine Salts
Disinfectants *

Dog Repellent
Ethylene Glycol
Fertilizers
Flea Spray/Powder
Fungicides *
Gopher Killer
Insect Sprays
Lead Compounds
Lice Powder
Lindane
Malathion
Mercury
Methylene Chloride
Mole Killer
Moth Crystals
Pentachlorophenol
Pesticides
Pharmaceuticals
Plant Food
Pruning Paint
Pyrethrins
Rat Poison
Rose Dust
Sheep Dip
Snail/Slug Killer
Strychnine
Tar Remover
Weed and Grass Killer
Windshield Wiper Fluid

* ***Check Ingredients***

Common Household Hazardous Wastes Continued

<u>Acetone</u>	<u>Flammable</u>
<u>Adhesive Catalysts</u>	<u>Organic Peroxide</u> <u>(Neutral)</u>
<u>Adhesives *</u>	<u>Flammable</u>
<u>Aerosol</u>	<u>Flammable</u>
<u>Air Freshener</u>	<u>Flammable</u>
<u>Alcohols</u>	<u>Flammable</u>
<u>Ammonia</u>	<u>Corrosive(Bases)</u>
<u>Ammonia Based Cleaners</u>	<u>Corrosive(Bases)</u>
<u>Ammonium Nitrate</u>	<u>Oxidizers</u>
<u>Ammunition</u>	<u>Explosives</u>
<u>Ant And Roach Killer</u>	<u>Poisons</u>
<u>Anti-Freeze</u>	<u>Poisons</u>
<u>Arsenic Compounds</u>	<u>Poisons</u>
<u>Artificial Snow</u>	<u>Flammable</u>
<u>Asbestos</u>	<u>Neutral</u>
<u>Asphalt Driveway Topping</u>	<u>Flammable</u>
<u>Asphalt Roof Tar</u>	<u>Flammable</u>
<u>Automotive Body Filler (Bondo)</u>	<u>Flammable</u>
<u>Automotive Body Filler Catalyst</u>	<u>Organic Peroxide</u> <u>(Neutral)</u>
<u>Automotive Cleaners</u>	<u>Poisons</u>
<u>Automotive Oils</u>	<u>Flammable</u>
<u>Automotive Waxes</u>	<u>Flammable</u>
<u>Bacterial Pipe Cleaners</u>	<u>Poisons</u>
<u>Bar-B-Que Lighter Fluid</u>	<u>Flammable</u>
<u>Battery Terminal Cleaner</u>	<u>Corrosive (Bases)</u>
<u>Benzene</u>	<u>Flammable</u>
<u>Bleach</u>	<u>Oxidizers</u>
<u>Bordeaux Mix</u>	<u>Poisons</u>
<u>Boric Acid</u>	<u>Corrosive(Acids)</u>
<u>Boric Acid</u>	<u>Poisons</u>
<u>Brake Fluid</u>	<u>Flammable</u>
<u>Bug Remover</u>	<u>Poisons</u>
<u>Calcium Hypochlorite</u>	<u>Oxidizers (Base)</u>
<u>Camphor</u>	<u>Flammable</u>
<u>Car Battery Acid</u>	<u>Corrosive(Acids)</u>
<u>Caustic Soda</u>	<u>Corrosive(Bases)</u>
<u>Cess Pool Cleaners *</u>	<u>Corrosive(Bases)</u>
<u>Chlorates</u>	<u>Oxidizers</u>
<u>Chlordane</u>	<u>Poisons</u>
<u>Chrome-Silver Polishes *</u>	<u>Flammable</u>
<u>Chrome-Silver Polishes *</u>	<u>Poisons</u>
<u>Chromium</u>	<u>Poisons</u>
<u>Copper Cleaners</u>	<u>Corrosive(Acids)</u>
<u>Copper Sulfate</u>	<u>Poisons</u>
<u>Cutting Oil</u>	<u>Flammable</u>
<u>Ddt</u>	<u>Poisons</u>
<u>Degreaser</u>	<u>Flammable</u>
<u>Denatured Alcohol</u>	<u>Flammable</u>
<u>Diazinon</u>	<u>Poisons</u>
<u>Diesel Fuel</u>	<u>Flammable</u>
<u>Dimethylamine Salts</u>	<u>Poisons</u>
<u>Disinfectants</u>	<u>Flammable</u>
<u>Disinfectants *</u>	<u>Poisons</u>
<u>Dog Repellent</u>	<u>Poisons</u>
<u>Drain Cleaners *</u>	<u>Corrosive(Bases)</u>
<u>Dry Cleaning Fluids</u>	<u>Flammable</u>
<u>Duplicator Fluid</u>	<u>Flammable</u>
<u>Enamel Paint (Unsolidified)</u>	<u>Flammable</u>
<u>Enamel/Oil Base Paint</u>	<u>Flammable</u>
<u>Epoxy Paint (Unsolidified)</u>	<u>Flammable</u>
<u>Etching Solutions</u>	<u>Corrosive(Acids)</u>
<u>Ethanol</u>	<u>Flammable</u>
<u>Ether</u>	<u>Flammable</u>
<u>Ethylene Glycol</u>	<u>Flammable</u>
<u>Ethylene Glycol</u>	<u>Poisons</u>
<u>Ferric Chloride</u>	<u>Corrosive(Acids)</u>
<u>Fertilizers *</u>	<u>Corrosive(Acids)</u>
<u>Fertilizers *</u>	<u>Oxidizers</u>
<u>Fertilizers *</u>	<u>Poisons</u>
<u>Fiberglass Resins (Unsolidified)</u>	<u>Flammable</u>
<u>Fingernail Polish And Remover</u>	<u>Flammable</u>
<u>Fireworks</u>	<u>Explosives</u>
<u>Flares</u>	<u>Explosives</u>
<u>Flea Spray/Powder</u>	<u>Poisons</u>
<u>Floor/Furniture Polish</u>	<u>Flammable</u>
<u>Fluorine</u>	<u>Oxidizers</u>
<u>Formaldehyde Solution</u>	<u>Flammable</u>
<u>Formalin</u>	<u>Flammable</u>
<u>Fungicides *</u>	<u>Poisons</u>
<u>Gasoline</u>	<u>Flammable</u>
<u>Glues *</u>	<u>Flammable</u>
<u>Gopher Killer</u>	<u>Poisons</u>
<u>Grease</u>	<u>Flammable</u>
<u>Hair Coloring</u>	<u>Oxidizers (Neutral)</u>
<u>Household Cleaners *</u>	<u>Corrosive(Bases)</u>
<u>Household Waxes</u>	<u>Flammable</u>
<u>Hydrochloric Acid</u>	<u>Corrosive(Acids)</u>
<u>Hydrofluoric Acid</u>	<u>Corrosive(Acids)</u>
<u>Hydrogen Peroxide</u>	<u>Oxidizers</u>
<u>Insect Sprays</u>	<u>Poisons</u>
<u>Iodine</u>	<u>Oxidizers</u>
<u>Isopropyl Alcohol</u>	<u>Flammable</u>
<u>Kerosene</u>	<u>Flammable</u>
<u>Lacquer Paint (Unsolidified)</u>	<u>Flammable</u>
<u>Lacquer Thinner</u>	<u>Flammable</u>
<u>Lead Compounds</u>	<u>Poisons</u>
<u>Lice Powder</u>	<u>Poisons</u>
<u>Lime</u>	<u>Corrosive(Bases)</u>
<u>Lindane</u>	<u>Poisons</u>
<u>Linseed Oil</u>	<u>Flammable</u>
<u>Liquid Butane</u>	<u>Flammable</u>
<u>Liquid Sandpaper *</u>	<u>Flammable</u>
<u>Liquid Waxes *</u>	<u>Flammable</u>
<u>Lye</u>	<u>Corrosive(Bases)</u>
<u>Malathion</u>	<u>Poisons</u>
<u>Mercury</u>	<u>Poisons</u>
<u>Metal Cleaners</u>	<u>Corrosive(Acids)</u>
<u>Methanol</u>	<u>Flammable</u>
<u>Methyl Etyhl Ketone Peroxide</u>	<u>Organic Peroxide</u> <u>(Neutral)</u>
<u>Methylene Chloride</u>	<u>Poisons</u>
<u>Mineral Spirits</u>	<u>Flammable</u>
<u>Mole Killer</u>	<u>Poisons</u>
<u>Moth Balls Or Crystals</u>	<u>Poisons</u>
<u>Muriatic Acid</u>	<u>Corrosive(Acids)</u>
<u>Nail Polish And Remover</u>	<u>Flammable</u>
<u>Naphtha</u>	<u>Flammable</u>
<u>Navel Jelly</u>	<u>Corrosive(Acids)</u>
<u>Nitric Acid</u>	<u>Oxidizers (Acid)</u>

<u>Oils (Petroleum)</u>	<u>Flammable</u>	<u>Weed And Grass Killer</u>	<u>Poisons</u>
<u>Old Glow In The Dark Watches</u>	<u>Radioactive</u>	<u>White Gas</u>	<u>Flammable</u>
<u>Organic Solvents</u>	<u>Flammable</u>	<u>Window Cleaners</u>	<u>Corrosive(Bases)</u>
<u>Oven Cleaners *</u>	<u>Corrosive(Bases)</u>	<u>Windshield Wiper Fluid</u>	<u>Flammable</u>
<u>Paint Strippers *</u>	<u>Flammable</u>	<u>Windshield Wiper Fluid</u>	<u>Poisons</u>
<u>Paint Thinners</u>	<u>Flammable</u>	<u>Wood Filler/Putty</u>	<u>Flammable</u>
<u>Paradichlorobenzene</u>	<u>Poisons</u>	<u>Wood Stain</u>	<u>Flammable</u>
<u>Paraffin Oil</u>	<u>Flammable</u>	<u>Xylol/Xylene</u>	<u>Flammable</u>
<u>Pentachlorophenol</u>	<u>Flammable</u>		
<u>Pentachlorophenol</u>	<u>Poisons</u>		
<u>Perchloroethylene</u>	<u>Poisons</u>		
<u>Perfume</u>	<u>Flammable</u>		
<u>Pesticides</u>	<u>Poisons</u>		
<u>Petroleum Distillates</u>	<u>Flammable</u>		
<u>Pharmaceuticals</u>	<u>Poisons</u>		
<u>Phosphoric Acid</u>	<u>Corrosive (Acids)</u>		
<u>Plant Food</u>	<u>Poisons</u>		
<u>Plant Food *</u>	<u>Oxidizers</u>		
<u>Plastic Model Cement</u>	<u>Flammable</u>		
<u>Plastic Roof Cement</u>	<u>Flammable</u>		
<u>Polyurethane Cement (Unsolidified)</u>	<u>Flammable</u>		
<u>Polyurethane Paint (Unsolidified)</u>	<u>Flammable</u>		
<u>Pool Acid</u>	<u>Corrosive(Acids)</u>		
<u>Potassium Permanganate</u>	<u>Oxidizers</u>		
<u>Power Steering Fluid</u>	<u>Flammable</u>		
<u>Primers</u>	<u>Flammable</u>		
<u>Pruning Paint</u>	<u>Poisons</u>		
<u>Pyrethrins</u>	<u>Poisons</u>		
<u>Rat Poison</u>	<u>Poisons</u>		
<u>Roof Tar</u>	<u>Flammable</u>		
<u>Roofing Cement</u>	<u>Flammable</u>		
<u>Rose Dust</u>	<u>Poisons</u>		
<u>Rug/Upholstery Cleaner</u>	<u>Flammable</u>		
<u>Sealers</u>	<u>Flammable</u>		
<u>Sheep Dip</u>	<u>Corrosive(Acids)</u>		
<u>Sheep Dip</u>	<u>Poisons</u>		
<u>Shellac Thinner</u>	<u>Flammable</u>		
<u>Silicone Sprays</u>	<u>Flammable</u>		
<u>Smoke Alarms</u>	<u>Radioactive</u>		
<u>Snail/Slug Killer</u>	<u>Poisons</u>		
<u>Sodium Bisulfate</u>	<u>Corrosive(Acids)</u>		
<u>Sodium Hydroxide</u>	<u>Corrosive(Bases)</u>		
<u>Sodium Hypochlorite</u>	<u>Oxidizers (Base)</u>		
<u>Spot Remover Fluids</u>	<u>Flammable</u>		
<u>Strychnine</u>	<u>Poisons</u>		
<u>Sulfuric Acid</u>	<u>Corrosive(Acids)</u>		
<u>Tar Remover</u>	<u>Poisons</u>		
<u>Thermometer</u>	<u>Poisons</u>		
<u>Thinner</u>	<u>Flammable</u>		
<u>Tile Cement</u>	<u>Flammable</u>		
<u>Tire Black</u>	<u>Flammable</u>		
<u>Toilet Bowl Cleaner With Bleach</u>	<u>Oxidizers (Base)</u>		
<u>Toilet Bowl Cleaners *</u>	<u>Corrosive(Acids)</u>		
<u>Toluol/Toluene</u>	<u>Flammable</u>		
<u>Transmission Fluid</u>	<u>Flammable</u>		
<u>Transmission Oil</u>	<u>Flammable</u>		
<u>Tree Root/Stump Killer</u>	<u>Organic Peroxide</u>		
	<u>(Neutral)</u>		
<u>Turpentine</u>	<u>Flammable</u>		
<u>Varnish</u>	<u>Flammable</u>		
<u>Wallpaper Cement</u>	<u>Flammable</u>		
<u>Warfarin</u>	<u>Poisons</u>		

IX. Prohibited Material Exchange List

1,1,1-trichloroethane
 1,3-dichloropropene (Telonel)
 2,3,4,5-Bis(2-butylene)tetrahydro-2-furaldehyde (Repellent- 11)
 2,3,7,8-TCDD (2,3,7,8-tetrachloro dibenzo-p-dioxide)
 2,3,7,8-tetrachloro dibenzo-p-dioxide (2,3,7,8-TCDD)
 2,4,5- trichlorophenol (2,4,5-TCP)
 2,4,5-T (2,4,5-trichlorophenoxyacetic acid)
 2,4,5-trichlorophenoxyacetic acid (2,4,5-T)
 2,4,5-trichlorophenoxypropionic acid (silvex)
 2,4-D (2,4-dichlorophenoxyacetic acid)
 2,4-DB (2,4-dichlorophenoxybutyric acid)
 2,4-dichlorophenoxyacetic acid (2,4-D)
 2,4-dichlorophenoxybutyric acid (2,4-DB)
 2,4-dichlorophenoxypropionic acid (2,4-DP)
 2,4-dichlorophenyl p-nitrophenyl ether (TOK)
 2,4-dinitrophenol
 2,4-DP (2,4-dichlorophenoxypropionic acid)
 2-methyl-4-chlorophenoxyacetic acid (MCPA)
 3,4-dichloropropionanilide (propanil)
 3,6-dichloro-o-anisic acid) (Banvel (dicamba)
 3-chloro-p-toluidine hydrochloride (Starlicide)
 4,6-dinitro-o-cresol
 4-amino-3,5,6-trichloropicolinic acid (Tordon)
 4-aminopyridine (Avitrol)
 acrolein for use as an aquatic herbicide
 alachlor (Lasso)
 aldicarb (Temik)
 aldrin
 aluminum phosphide (Phostoxin)
 amatriz (Baam, Mitac)
 Ambush (permethrin)
 arsenic trioxide
 arsenic, inorganic
 avadex (diallate)
 Avitrol (4-aminopyridine)
 azinphosmethyl (Guthion)
 Azodrin (dimethyl phosphate of 3-hydroxy-N-methyl-cisrotonamide)
 Baam (amatriz)
 Banvel
 bentazon
 benzene hexachloride (BHC)
 BHC (benzene hexachloride)
 Bidrin (dimethyl phosphate of 3-hydroxy N,N-dimethyl-cisrotonamide)
 Bolero
 bromoxynil
 butrayate
 cadmium compounds
 calcium arsenate
 calcium cyanide
 captafol
 captan
 carbaryl (Sevin)
 carbofuran (Furadan)
 carbon bisulfide
 carbon tetrachloride
 carbophenothion (Trithion)
 chloranil
 chlordane
 chlordecone (kepone)
 chlordimeform (Fundal) (Galecron)
 chlorinated camphene (Toxaphene)
 chlorobenzilate
 chlorodimeform
 chloromethoxypropylmercuric acetate (CPMA)
 chloropicrin
 Chlorpyrifos
 Compound 1080
 Compound 1080 (sodium flouroacetate)
 copper arsenate
 cresote
 cyanide compounds
 cyhexatin
 Clopyralid
 Daminozide
 Dasanit (O,O-diethyl O-[4-(methylsulfinyl) phenyl] phosphorothioate)
 DBCP
 DDD (TDE)
 DDT
 DDVP
 decachlorooctahydro- 1,3 ,4-methano-2H-cyclobuta(cd) pentalen-2-one (chlordecone)
 DEF (S,S,S-tributyl phosphorotrithioate)
 demeton (Systox)
 Di(phenylmercury)dodeceny succinate (PMDS)
 dialifor (Torak)
 diallate (avadex)
 Diazion
 dicamba (3,6-dichloro-o-anisic acid) (Banvel)
 dieldrin
 dimethioate
 dimethyl phosphate of 3-hydroxy N,N-dimethyl-cisrotonamide (Bidrin)
 dimethyl phosphate of 3-hydroxy-N-methyl-cisrotonamide (Azodrin)
 dimilin
 dinoseb and salts
 Disulfoton (di-syston)
 di-syston
 Dursban (Chlorpyrifos)
 Dylox
 EBDCs
 EDB
 EDC
 EDC (ethylene dichloride)
 EDP
 Eldrin
 endosulfan (Thiodan)
 endrin
 EPN
 EPP
 Ethion
 Ethoprop (Mocap)
 ethyl 3-methyl-4-(methylthio) phenyl (1-methyl ethyl) phosphoramidate (Nemacur)
 ethyl hexyleneglycol
 ethylene dibromide
 ethylene dichloride (EDC)

ethylene oxide
 Far Go (trillate)
 Fenamiphos (Nemacur)
 Fluoroacetamide
 Folex (tributyl phosphorotrithioite)
 formaldehyde
 Fundal (chlordimeform)
 Furadan
 Galecron
 Galecron (chlordimeform)
 Guthion (azinphosmethyl)
 harvade
 HCB
 heptachlor
 hexachlorobenzene (HCB)
 hoelon
 igran (Terabutryn)
 kepone
 Kerb (pronamide)
 Lannate (methomyl)
 Lasso (alachlor)
 lead arsenate
 leptophos
 lindane
 malathion
 maleic hydrazide-ethanolamine salt
 MCPA (2-methyl-4-chlorophenoxyacetic acid)
 mercuric chloride
 mercurous chloride
 mercury compounds
 metam sodium
 Metasystox-R (oxydementon-methyl)
 Methamidophos (Monitor)
 Methidathion (Supracide)
 methomyl (Lannate, Nudrin)
 methoxychlor
 methyl bromide
 methyl isothiocyanate (MITC)
 methyl parathion
 mevinphos (Phosdrin)
 mirex
 Mitac (amatriz)
 MITC
 Mocap (O-ethyl S,S-dipropyl phosphorotrithioate)
 Molinate (Ordram)
 Monitor (O,S-dimethyl phosphoramidothioate)
 monocrotophos
 naled
 Nemacur (ethyl 3-methyl-4-(methylthio) phenyl (1-methyl ethyl) phosphoramidate)
 nitrofen
 Nudrin (methomyl)
 O,O dimethyl phosphorodithioate, S-ester with 4-(mercaptomethyl)-2-methoxy-O₂-1,3,4-thiadiazolin-S-one (Supracide)
 O,O-diethyl O-[4-(methylsulfinyl) phenyl] phosphorothioate (Dasanit)
 O,S-dimethyl phosphoramidothioate (Monitor)
 octamethylpyrophosphoramide
 O-ethyl S,S-dipropyl phosphorotrithioate (Mocap)
 OMIPA (octamethylpyrophosphoramide)

OMPA (schradan)
 Ordram
 oxadiazon (Ronstar)
 oxydementon-methyl (Metasystox-R)
 paraquat (Gramoxone)
 parathion
 PCBs
 PCNBs
 pentachlorophenol
 permethrin (Ambush,Pounce)
 phenylmercuric oleate (PMO)
 phenylmercury acetate (PMA)
 phorate (Thimet)
 Phosdrin (mevinphos)
 phosphamidon
 Phostoxin (aluminum phosphide)
 picloram (Tordon)
 Picloram (tordon)
 PMA
 PMDS
 PMO
 polychlorinated biphenols
 potassium 2,4,5-trichlorophenate (2,4,5-TCP)
 Pounce (permethrin)
 Profluralin (Tolban)
 pronamide (Kerb)
 propanil (3,4-dichloropropionanilide)
 pyriminil (Vacor)
 Repellent- 11
 ridomil
 ronalin
 ronnel
 Ronstar (oxadiazon)
 S,S,S-tributyl phosphorotrithioate (DEF)
 safrole
 schradan (OMPA)
 Sevin (carbaryl)
 silvex (2,4,5-trichlorophenoxypropionic acid)
 sodium arsenate
 sodium arsenite
 sodium cyanide
 sodium fluoroacetate (Compound 1080)
 Starlicide (3-chloro-p-toluidine hydrochloride)
 Strobane
 strychnine
 sulfotepp
 Supracide (O,O dimethyl phosphorodithioate, S-ester with 4-(mercaptomethyl)-2-methoxy-O₂-1,3,4-thiadiazolin-S-one)
 Systox (demeton)
 TDE (DDD)
 Telonel
 Temik (aldicarb)
 Terabutryn (igran)
 Terpene polychlorinates (Strobane)
 thallium sulfate
 Thimet (phorate)
 Thiobencarb (Bolero)
 Thiodan (endosulfan)
 TOK (2,4-dichlorophenyl p-nitrophenyl ether)
 Tolban (Profluralin)

Torak (dialifor)
Tordon (picloram), (4-amino-3,5,6-trichloropicolinic acid))
Toxaphene
Treflan
tribufos (DEF, Folex)
tributyl phosphorotrithioite (Folex)
tributyltin compounds
trillate (Far Go)
Trithion (carbophenothion)
Vacor
Vegadex
vinyl chloride
zinc phosphide