Updated by: Kathleen Smith Effective: 02/02/2012 Scope: HDMC	**Work Instruction** **Waste Disposal Activities** ***** Uncontrolled ***** ***** DOCUMENT ***** **Please destroy this document after use** **Assoc. Policy:** QUALITY MANUAL **Assoc. Procedure:** HS2.03 **Assoc. Work Instr:** YS2.03.637	Site: York Dept: Environmental Group: ALL Number: YS2.03.637 Version: 13 Status: Active Legacy Number:

PURPOSE:
To provide general awareness to employees of the York Vehicle Operation's who generate waste to comply with applicable federal, state and local regulations; and agencies (EPA, PADEP, Springettsbury Township, DOT, etc.)
To define the types/classifications of waste generated as Municipal, Residual /Non-Hazardous, Hazardous, Universal, or To Be Determined.
To provide information on the waste streams and its classification to properly label the waste container that may include in-use containers and empty containers.
To ensure proper preparation of waste containers for shipment/transportation and disposal according to federal, state and local regulations.

SCOPE: Covers employees, contractors, etc. who generate waste at York Vehicle Operations.

RESPONSIBILITY: All employees.

DEFINITIONS:

BLDG. - Building
DOT - Department of Transportation
EPA - Environmental Protection Agency
GPT - General Plant Trash
GWTS - Groundwater Treatment System
HWSA - Hazardous Waste Storage Area
ID - Identification
MSDS - Material Safety Data Sheet
WI - Work Instruction
WH - Waste Handler
WWTP - Waste Water Treatment Plant
YVO - York Vehicle Operations
RCRA - Resource Conservation Recovery Act
PADEP - Pennsylvania Department of Environmental Protection

PROCEDURE:

1.Overview:
1.1 What is a waste?

- Materials/Chemicals from an industrial process that no longer have a useful life or are no longer needed
- Products/materials/chemicals that are expired
- Spent Products/materials/chemicals
- Materials that are not reclaimed

1.2 The four types of wastes at Harley-Davidson are municipal, universal, non-hazardous and hazardous. Examples of the waste generated at the facility associated with the waste types are listed as follows:

- Municipal waste may include office paper and cafeteria trash
- Universal waste may include batteries and lamps. See Section 2.4.9
- Non-hazardous waste or residual waste may include general plant trash, cardboard, black and color dry powder paint, paint sludge, scrap metal, wood and abrasives. See Section 2.4.1
- Hazardous wastes may include paint, solvents, and the associated debris and PPE, acids and alkalines.

See Section 2.4.5

2. GENERAL REQUIREMENTS:

2.1. Waste Stream Consistency

- It is important to keep our waste streams consistent. Waste stream in general must be sampled and approved for disposal at an appropriately permitted facility.
- Any significant deviations in the composition of these approved waste streams can cause surcharges, rejection and return of shipment and the possibility of fines and penalties. This could occur if waste is placed into improperly labeled containers or improperly co-mingled together.

2.2. Determination of Hazardous/Residual Waste Classification

- Waste is considered to be hazardous if it is a characteristic or listed waste.
- One way to determine if the waste is a characteristic hazardous waste is to collect a sample and analysis it to see if it has one or more of the following properties: ignitability, corrosivity, reactivity or toxicity.
- Ignitability characteristic identifies wastes that can readily catch fire. These have a flash point less than 140 degree F.
- Corrosivity characteristic identifies wastes that are acidic (which has a pH less than or equal to (≤) 2.0) or alkaline (which has a pH greater than or equal to (≥) 12.5). Both of which can corrode or dissolve flesh, metal or other materials.
- Reactivity characteristic indentifies wastes that readily explode or undergo violent reactions such as sulfide or cyanide bearing wastes which react with acids or alkalines.
- Toxicity characteristic identifies wastes that leach dangerous concentrations of toxic chemicals into the groundwater. A Toxic Characteristic Leaching Procedure is used to determine this characteristic.
- If a waste has one or more of these four properties, it is a characteristic waste and will have a D waste code.
- It is a listed waste if it comes from a "listed" operation. A listed waste can have an F, K, P and U waste code. For example: Spent solvent bath / flushing operation (F003)
- Wastes that are not considered characteristic or listed hazardous wastes are either residual, municipal or universal.

2.3. Container Requirements

2.3.1 Waste in Container/Lid Closure

- Waste on the floor should be inside a labeled container unless the containers are being serviced.
- Do not leave bags of waste next to the container.
- Under RCRA, the EPA and PADEP require all hazardous waste containers to be closed at all times except when adding or removing waste. Keeping a lid open is unacceptable for hazardous waste.

2.3.2 Selection of Container

- Selecting proper waste containers for your hazardous waste stream is critical. The container must be compatible with the waste.
- When selecting containers, make sure the container is in good condition. As you are accumulating waste, inspect the container to ensure it is still in good condition. There should be no severe rusting, no sharp-edged creases or dents, no leaking wastes, no waste residue anywhere on the container. If there is residue, the container must be cleaned, decontaminated or over packed.
- If you need assistance, please contact the Environmental Department.

2.3.3 Filling Container

- Liquid waste containers must not be filled to the rim or very top of container to comply with DOT regulations.
- In general drums should have 3 to 4 inches of headspace and totes should have 6 to 8 inches of headspace to allow for the temperature and pressure changes. Bulging containers also create a safety hazard for personnel expected to add waste, remove waste or handle the containers.
- Solid waste containers on the floor should not be overflowing (i.e. filled above the rim of the container)
- For heavy solids/sludges, additional headspace is required for the drums.
- Do not fill roll offs above rim.

- For additional help on container filling contact the Environmental Department.

2.4 Labeling

2.4.1. Residual Non-Hazardous Waste Labeling

All Residual/Non-Hazardous waste containers must be labeled with an approved and completed Residual Waste/Non-Hazardous Waste label immediately upon placing waste in the container. Each person who generates and places waste into a container is responsible to make sure the container is properly labeled and all data sections completed. The waste label must include:

1. Generator (shipper) name and address (see 2.4.2)
2. Contents - description of waste (see 2.4.3 and 2.4.4)
3. If there is liquid (water) the pH, corrosivity index, must be reported/listed in the contents section. Special note: a pH value below 7.0 is an acid and above 7.0 is alkaline. A pH value of 7 is neutral.

2.4.2. Example Information for Label: Generator Information

Name: **Harley-Davidson Motor Company Operations, Inc.**
Address: **1425 Eden Rd.**
City: State: Zip: **York, PA 17402**

Contents / Proper Description: _____ (Needs to be Completed)

2.4.3. Area Specific Non-Hazardous Wastes

Proceco Filters & Debris
Live Paint Sludge
WWTP Sludge
Mixed Paint Sludge
Sludge Pit Water
Powder Paint Waste (all colors)
E-coat
Phosphate Sludge (Filter Cake)
Plastic Items for Recycling (caps, bungs, drums, plastic wrap, shrinkwrap, etc.)

2.4.4. General Non-Hazardous Wastes

Abrasive Waste (Weld Dust, Dust Collector Filters)
Aqueous (Water based) Parts Washer Solution
Parts washer solvent solution (used in Safety Kleen type units except aqueous)
Construction and Demolition Waste (For special projects contact Environmental to confirm disposal container requirements)
Waste Oils/Coolants
Fire Brick - RTO
Friable/Non-friable Asbestos
General Plant Trash (GPT)
Oily Debris (Pigs, socks, mats, etc.) including minor amount of metal fines/turnings
Storm Sewer Cleaning Waste (liquids/soil/residues/oily debris)
Tires
Waste Brake Fluid / Synthetic Waste Oils

Aluminum Cans (No label required)
Cardboard waste
Office/Other paper (No label required)
Plastic drink bottles (no label required)
Mop Sinks - mop water and/or floor scrubbing waste water only, unless otherwise approved by environmental
Scrap Metal (Carbon steel, aluminum, stainless steel, plated components, copper, brass, etc.)

a) Copper and brass items such as weld tips, gas caps, spot weld tips, copper tubes, brass hammers, etc. that are not coated will be collected in the area of generation in various containers.
b) Copper and brass items that are coated such as insulated wires, shielded cabling, etc. will be collected in the area of generation in various containers.
c) Process area label the container with a green, residual/non-hazardous waste label including a description of the contents.
d) WH will collect and transport the items for recycle.

2.4.5. Hazardous Waste Labeling

All Hazardous waste containers must be labeled with an approved and completed Hazardous Waste label immediately upon placing waste in the container. Each person who generates and places waste into a container is responsible to make sure the container is properly labeled and all data sections completed. The waste container must be tightly closed at all times, except when adding and removing waste. The waste label must include:

1. Generator name, address, phone number and EPA ID No.
2. EPA/Waste No.
3. Accumulation Start Date: This date is required when 55 gallons of a waste has been accumulated in either one container or a combination of several containers. All the containers must be dated at one satellite accumulation point when 55 gallons is reached / accumulated at the grouping. Waste must be picked up and moved to the 90 day storage area once it has been dated.
4. Use either the DOT Proper Shipping Description or in-house contents description. (Waste to be treated and/or handled/repackaged on-site) Need to list Bldg No. where waste is generated. This is the label section below EPA ID No. and EPA Waste No.
5. If there is liquid (water) then the pH must be reported/listed in the contents section. Special note: a pH value of 0.1 to 6.9 is an acid, and a pH value of 7.1 to 14.0 is a base or alkaline, and a pH value of 7 is neutral.

2.4.6 Example Information for Label: Generator Information

Name: **Harley-Davidson Motor Company Operations, Inc.**
Address: **1425 Eden Rd.**
City: **York** State: **PA** Zip: **17402**
Phone No.: 717-848-1177
EPA ID No. **PAD 001643691**
EPA Waste No.: (Examples F006, D002, D007, D008, etc.)
Date: MUST BE FILLED IN (see 2 Note 3)
DOT Proper Shipping Description or In-house Contents Description: _____**, Building Location _____,** (Needs Completed)
pH = _____ (Needs Completed)

2.4.7. Area Specific Hazardous Wastes - YVO [In-house contents description/EPA Waste No(s)]

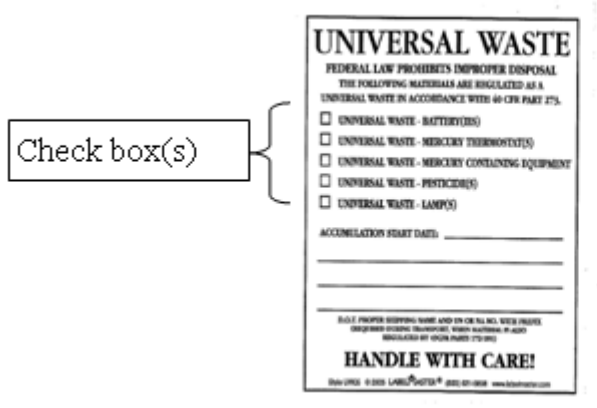
Waste Solvents / D001, F003
Paint PPE, Filters and Debris / D001, F003, D035
Phosphatizer (Phosphate) Washer Filters & Debris / D002
Misc. Solvents / D001, F003, F005
Mixed Acid Cleaners / Misc. Acids / D002
Mixed Alkaline Cleaners / Misc. Alkaline Cleaners / D002
GWTS carbon changeout / D040, F001, D039

2.4.8. General Hazardous Wastes

Typical hazardous waste items consisting of aerosol cans, alcohol bottles, loctite, lubricant containers, touch-up paint are placed in 55 gallon metal yellow hazardous waste drums. Items placed in these hazardous waste containers may also include small plastic and metal containers / cans.

2.4.9. Universal Waste Labeling

All universal waste containers must be labeled with an approved and completed Universal Waste label immediately upon placing waste in the container. Each person who generates and places waste into a container is responsible to make sure the container is properly labeled. If universal wastes are not managed and recycled properly, they may be considered hazardous waste. To ensure Universal wastes are recycled properly place a check mark or "X" in the appropriate box(s) indicating contents of container on the label.



2.4.10. Universal Wastes

Wastes streams at H-D in this category are:
Obsolete Electronic Equipment. See 3.1. Collection and Packaging of Obsolete Electronic Equipment below for details.
Lamps 4', 8', bulbs, HID (High Intensity Discharge), odd sizes, u-shaped or circular fluorescent. See 3.2 Collection and Packaging of Fluorescent Lighting Fixtures below for details.
Mixed batteries from manufacturing activities, motorcycle production, motorcycle carriers, etc. including dry cell and electronic batteries. See 3.3 Dry Cell and Electronic Batteries below for details.
Lead acid batteries.

3. Special Handling Streams

3.1. Collection and Packaging of Obsolete Electronic Equipment

Obsolete manufacturing electronic equipment is to be recycled. Some examples of manufacturing electronic scrap are circuit boards, mixed components, capacitors, connectors, drives, keyboards, monitors, etc. The internal method for recycling is:
1. Departments segregate obsolete manufacturing electronic equipment.
2. Departments call HWSA at ext. 6266 for collection.
3. WHs collect obsolete manufacturing electronic equipment.
4. WHs properly package the equipment, label the container/equipment with a universal waste label, and store the container/equipment in a satellite accumulation area.

3.2. Collection and Packaging of Fluorescent Lighting Fixtures

Disposal of lighting fixtures spent or obsolete, etc. are to be recycled. Some examples include fluorescent (straight-tube, compact, and odd shapes), 4' or 8' lamps and bulbs, high-intensity discharge (HID), mercury-vapor, metal halide, high-pressure sodium, neon, other types of used/spent HID bulbs, High Pressure Sodium, and fluorescent tubes (circular, U-shape, small lengths, etc.). If the lamps are crushed, they must be disposed as Hazardous waste. Contact WH for pickup at 6266 from an in-house phone.

3.3 Dry Cell, Electronic and Lithium Batteries

Take spent battery to the collection point at the Tool Crib. Perform these proper steps before placing batteries into the container.

Special Note: Lithium batteries MUST be separated from all other batteries. Do not mix.

1. All employees are to use tape dispenser provided and pull off a length of tape long enough to cover (+) and (-) terminals (separately or together) and apply.
2. Tool Crib Attendant (TCA) will keep the tape dispenser filled. If the dispenser is empty, notify the TCA.
3. Carefully place the now compliant batteries into the appropriate collection container. Remember to place Lithium batteries in the container identified/labeled "Lithium Batteries Only." Place all alkaline and NiCad batteries in container labeled "All Other Batteries".
4. WH will remove the full drum, transport it to HWSA, and replace with an empty properly labeled drum.
5. Alert your supervisor of any questions or battery condition issues.

For additional information see the Visual Aid Used Battery Notice posted in the area. YS2.03.637.VA1

Batteries with Terminals taped	**Disposal area Tool Crib**
	

3.4. Lead Acid Batteries

Lead acid batteries are to be disposed / recycled such as motorcycle batteries.

1. The generator is to contact the HWSA at ext. 6266 for pick up by a WH.
2. The WH will move the batteries to the designated storage area for recycling or disposal.
3. WHs will properly package the equipment, label the container/equipment with a universal waste label, and store the container/equipment in a satellite accumulation area.

3.5. WASTE TO BE DETERMINED

Wastes not defined as non-hazardous, hazardous or universal are to be labeled as a hazardous waste. The contents area of the label must include details listed in Section 2 Hazardous Waste Labeling and must contain the words "To Be Determined". This is to be followed for waste listed below but not limited to:

Anion/Cation Resins
Lead Paint
Non-Standard Contaminated Soils
Spill Clean-up / ERT - PPE and Associated items

3.6. Various Container Types and Product Disposals

3.6.1 Various Empty Container Disposal

EPA defines empty as less than (<) 1 inch of material remaining (meaning not to be viewed as an allowable quantity) and is poured empty. DOT requires the drum be empty, sealed and containing original labeling identifying the emptied contents.

1. Department offering drum or tote of various sizes for disposal is responsible to empty the container by pouring out any remaining material. If necessary, prop up the drum using a drum wedge a few inches and lean / tilt it towards the removing mechanism (pump) to enable the contents to be removed.
2. Make sure contents are poured out, pumped out and drum or tote is empty. Tighten bungs to ensure no other materials enter or are released from the drum.
3. Follow the additional details below for specific container types.

3.6.2 Empty Fiberboard Container Disposal

1. WH picks up and transports to HWSA for recycling.

3.6.3 Empty Plastic Container Disposal

1. Process area designates an employee to properly identify the container, may be various sizes, with "Empty" on the lid. "Empty" could be identified by legibly writing empty on the lid or by placing a label with the word "Empty" on the lid.
2. Process area designates an employee to attach a Material Safety Data Sheet (MSDS) of the product that was in the container to the empty container before pick up and disposal.
3. If a process area has a designated location for the storage of wastes and/or empty containers, then the process area designates an employee to move the empty containers to that location for pick up and disposal.

4. Process areas that do not have designated waste storage locations, contact HWSA at ext. 6266 for pick up and disposal.
5. WH conducts routine checks of the designated storage locations and will remove empty containers for cleaning/reuse/recycling or disposal.
6. WH transports the empty containers to WWTP depending on where the empty container was generated. The exception is for containers that stored oil or solvent. WH manages drums for cleaning and reuse.
7. If the plastic container is an "open top" 55-gallon drum, the WH will store the empty containers for reuse as a collection container for oily waste debris or for other recycling items, etc.
8. If reused, the product label needs to be removed or blacked out and appropriate labeling applied.
9. The WH may dispose of the remaining empty plastic containers as "General Plant Trash" that cannot be recycled.

3.6.4 Empty Metal Container Disposal

1. For Empty Metal Containers repeat steps 1 to 6 of Empty Plastic Container Disposal.
2. The WH will remove metal containers for disposal. Open-top metal containers will be reused. Non open-top metal containers will be taken to HWSA to be reused or crushed and disposed of as "Scrap Metal".
3. WH stores drum upside down on proper skid in the designated waste areas; to indicate the drum is sufficiently empty and ready for recycle and prevents any rain water from leaking into the drum.

3.6.5 Expired Product Disposal

1. Before an expired product can be removed for disposal, each process area must designate an employee to attach a MSDS to the container of product.
2. Once the MSDS is attached to the container, contact the Environmental Department for pick up and disposal.
3. If a process area has a designated location for the storage of wastes, the process area will designate an employee to move the expired/obsolete product, with a MSDS attached, to the process area's storage location for pick up and disposal.

NOTE: Multiple containers of same expired/obsolete product need only one MSDS attached to one item in the group.

4. A WH will remove expired/obsolete product to HWSA for disposal.
5. An Environmental Representative will review the MSDS and determine appropriate method for disposal of expired / obsolete product.
6. The expired/obsolete product will be processed and/or disposed of accordingly.

Quality Records:

Record Description	Record Series ID Number	Link to Retention Schedule
No records	**n/a**	**n/a**

If there are associated records with this document you can retrieve retention information by following this path: RIDE/Resource Centers/Legal/Records Management/Record Retention Schedules/[choose the appropriate schedule].
Also, utilize your help chain found on the Home page in QWeb to get the information you need.

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Signed by