Process Owner: Sharon Environmental Fisher Updated by: Sharon Environmental Fisher Effective: 12/08/2020 Scope: HDMC ISO Clause: 8.1 - Operational planning and control	**Work Instruction** # Waste Disposal Activities ***** Uncontrolled ***** ***** DOCUMENT ***** **Please destroy this document after use** **Reference Documents:** HS2.03, ENVIRONMENTAL & ENERGY POLICY	Site: York Dept: Environmental Group: ALL Number: YS2.03.637 Version: 26 Status: Active Legacy Number:

PURPOSE:
To provide general awareness to those 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 classification to properly label the waste container; which may include in-house 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 with the exception of transportation containers.

RESPONSIBILITY: All employees.

DEFINITIONS:

BLDG. - Building	SDS - Safety Data Sheet
DOT - Department of Transportation	WI - Work Instruction
EPA - Environmental Protection Agency	WH - Waste Handler
GPT - General Plant Trash	WWTP - Waste Water Treatment Plant
GWTS - Groundwater Treatment System	YVO - York Vehicle Operations
HWSA - Hazardous Waste Storage Area	RCRA - Resource Conservation Recovery Act
ID - Identification	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 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 test is used to determine this characteristic.
- If a waste has one or more of these four properties, it is a characteristic waste and has a D waste code.
- It is a listed waste if it comes from a "listed" operation. A listed waste may have an F, K, P or U waste code. For example: Spent solvent bath / flushing operation (F003)
- Wastes not considered characteristic or listed hazardous wastes are 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 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 waste is accumulated, 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 exterior. If there is residue, the container must be cleaned, decontaminated or over packed.
- If assistance is needed, 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 4 to 6 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 or remove waste or handle the waste 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 (top of container).
- 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 measured and 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
Mixed Paint Sludge
Sludge Pit Water
Powder Paint Waste (all colors)
E-coat
Phosphatizer (Phosphate) Washer Filters & Debris
Dampening material
Filters from Powder Paint System
Steel Weld Dust
Aluminum Weld Dust
Weld Cell Filters
Dust Collection Filters

2.4.4. General Non-Hazardous Wastes

Aqueous (Water based) Parts Washer Solution
Parts washer solvent solution (used in Safety Kleen type units except aqueous)
Construction and Demolition Waste (Contact Environmental to confirm disposal container requirements)
Waste Oils/Coolants
Fire Brick - RTO
Friable/Non-friable Asbestos
General Plant Trash (GPT) - Green residual waste label or a "Trash" label may be used
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
Municipal Recycling - Plastic bottles #1, 2 or 5, Aluminum/Steel containers, Glass bottles, Newspaper, Paperboard - Green residual waste label or a "Municipal Recycle" label may be used
Cardboard waste
Mop Sinks - mop water and/or floor scrubbing wastewater only, unless otherwise approved by Environmental
Scrap Metal (Carbon steel, aluminum, stainless steel, plated components, copper, brass, etc.)

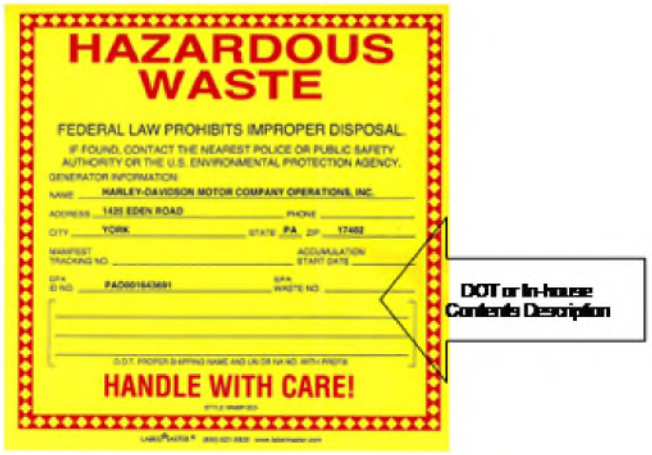
a) Copper and brass items such as weld tips, gas caps, spot weld tips, copper tubes, brass hammers, etc. that are not coated will be collected in the area of generation in various containers.

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) Small metal non-NCM components will be collected in Assembly in small green bins.
d) Painted/ecoat metal must be segregated from bare metal (steel & aluminum)

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 within 3 days 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). 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: _____ (Needs Completed)
pH = _____ (Needs Completed)

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

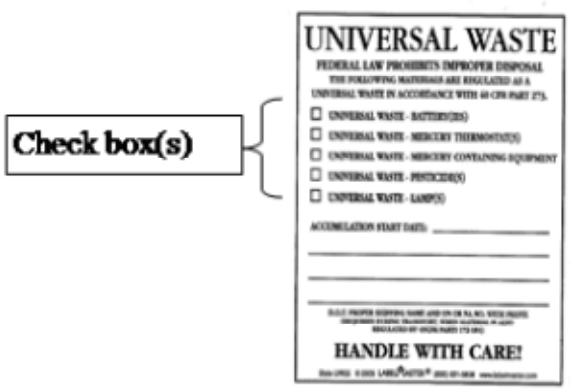
Waste Solvents / D001, D035, F003
Paint PPE, Filters and Debris / D001, F003, D035
Misc. Solvents / D001, F003, F005
Mixed Acid Cleaners / Misc. Acids / D002
Mixed Alkaline Cleaners / Misc. Alkaline Cleaners / D002
GWTS carbon change out / D040, F001, D039
Gasoline Spill PPE and Debris (D001, D018)
Phosphate Sludge (Filter Cake) and Filter Cloth (F019)
WWTP Sludge (F019)
Alcohol/ Isopropanol Alcohol Wipes (D001)

2.4.8. General Hazardous Wastes

Typical hazardous waste items consist of aerosol cans, alcohol bottles, loctite, lubricant containers, and 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.
Lamps 4', 8', bulbs, HID (High Intensity Discharge), odd sizes, u-shaped or circular fluorescent. See 3.2
Mixed batteries from manufacturing activities, motorcycle production, motorcycle carriers, etc. including dry cell and electronic batteries. See 3.3

3. Special Handling Streams

3.1. Collection and Packaging of Obsolete Electronic Equipment

Obsolete manufacturing electronic equipment is to be recycled and may include 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 717-852-6069 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 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 and packaged by 4', 8' or Miscellaneous types.
1. The 4' lamps and bulbs are packaged in 4' tubes.
2. The 8' lamps and bulbs are packaged in 8' boxes.
3. Miscellaneous 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 that are circular, U-shape, or small lengths) are packaged together in 4' tubes.
4. The tubes/boxes for lamps to be recycled must have the flaps taped closed unless adding additional lamps.

If the lamps are crushed, they must be disposed as Hazardous. Contact WH for pickup at 717-852-6069.

3.3 Dry Cell, Electronic and Lithium Batteries

Take spent battery to the Tool Crib collection point. 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. Place the compliant batteries into the appropriate collection container. Place Lithium batteries in the container 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 or contact Environmental.

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. Contact the HWSA at 717-852-6069 for pick up by a WH.
2. WH will transport 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/residual, hazardous or universal are to be labeled as a hazardous waste. The contents area of the label must include details listed in Section 2.4.5 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 Containers

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 on lids to ensure no other materials enter or are released from the drum or tote.
3. Follow the additional details below for specific container types.

3.6.2 Empty Fiberboard Drum w/ Metal

1. WH picks up and transports to compactor for disposal.

3.6.3 Empty Plastic Drums

1. Process area designates an employee to properly identify the container, may be various sizes, with "Empty" on the on top of container. "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 Safety Data Sheet (SDS) 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 without designated waste storage locations, contact HWSA at 717-852-6069 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. WH may place plastic drums on drum trailer for offsite reconditioning/reuse.

3.6.4 Empty Metal Drums

1. For Empty Metal Containers repeat steps 1 to 6 of Empty Plastic Container Disposal.
2. WH will remove metal containers for disposal. Open-top metal containers may be reused. Non open-top metal containers will be taken to HWSA to be reused or placed on the drum trailer for offsite reconditioning/reuse

3.6.5 Expired/Obsolete Product Disposal

1. Before an expired/obsolete product can be removed for disposal, each process area must designate an employee to attach a SDS to the container of product.
2. Once the SDS is attached to the container, contact HWSA at 717-852-6069 for pick up and disposal.
3. If a process area has a designated waste storage location, the process area will designate an employee to move the expired/obsolete product to the process area's storage location for pick up and disposal.

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

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

3.7 Gas Filter Disposal

1. Gas filters are to be recycled.
2. Departments call 717-852-6069 and a (WH) will come and collect the filters.

3.8 Filters from Powder Paint System

1. Filters must be bagged then boxed.
2. A Residual/Non-hazardous Waste Label (section 2.4.2) must be on the box, stating "Black or Color Powder Paint Filter (s)".
3. Call 717-852- 6069 and a (WH) will come and collect the filters.

3.9 Weld Cell Filters and Dust Collection Filters

1. Filters must be boxed.
2. A Residual/Non-hazardous Waste Label (section 2.4.2) must be on the box, stating "Filters for Scrap".
3. Call 717-852-6069 and a WH will come and collect the filters. If waste will be produced during a non-production shift, please contact 717-852 6069 during production hours to arrange a staging area/time for pick-up.

Quality Records:

Record Description	Record Series ID Number
n/a	**n/a**

If there are associated records with this document you can retrieve retention information by following this path: VIEW/Resources & Services/Records and Information Management/Record Retention Schedules/[choose the appropriate schedule category and schedule under Related Information].

Also, utilize your help chain found on the QWeb Home page to get the information you need.

Sharon Environmental

Fisher
Stephen George

Signed by