

Subject:	Photon Sciences Environmental Awareness for Machine Shop Operations (Course Code PS-ENV-SHOP)						
Number:	PS-TRN-CRM-0007	Revision:	B	Effective:	04/27/2012	Page	1 of 3

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*Approval signatures on file with master copy.

[Revision Log](#)

Instructions: Read the material below and then close this document. You will receive credit for training through the BNL training system.

Course Objective: Significant environmental aspects are associated with Machine Shop Operations. This course has been designed to provide you with the job-specific information that you need know to protect the environment and to meet Laboratory and Government regulations for handling the waste streams produced by this operation. The contents of this training have been extracted from the Photon Sciences PRM and BNL Subject Areas.

Description of Significant Environmental Aspect: Machine shop operations produce several types of waste that need to be controlled: RCRA¹ hazardous waste, industrial waste including recyclable material.

- The RCRA hazardous wastes produced by the shop include chemical wastes such as the contents of ultrasonic cleaners and non-empty aerosol spray cans. The "Lead Working" training and associated operating procedures covers management of lead and lead contaminated waste.
- The term "industrial waste" refers to non-RCRA hazardous waste that is banned from disposal into the regular trash by State and Federal regulations. Waste oil and oily rags are the industrial wastes produced by the shop. If the oil or oily rags become contaminated with other chemical products or lead, they become RCRA hazardous waste and must be managed as such.
- Recyclable material produced by the shop includes scrap solder dross and empty aerosol cans. An "empty" aerosol can is a can that no longer contains any product and is at atmospheric pressure.

Training Requirements: Shop managers are required to read this form and to take RCRA Hazardous Waste Generator training. Shop users are required to read this form.

Operational Controls:

- RCRA hazardous wastes must be containerized, labeled with a red hazardous waste label and kept in a Satellite Accumulation Area (SAA) until the job is complete, or the container is full. Then, the container must be brought to the 90-day Storage Area by the RCRA trained shop manager. A non-radioactive waste control form shall be filled out that describes the waste.
 - o Aerosol cans shall be discarded into the appropriate collection containers located by the NSLS Stockroom. One container is used to collect empty cans for recycling. The other is used to collect non-empty cans for disposal as hazardous waste.
 - o Collect solder dross in a small container labeled "lead scrap for recycling."
- Industrial wastes are managed in the same way as hazardous, i.e., waste container must be closed and stored in secondary containment. However, this waste is labeled with a green, non-hazardous waste label and does not need to be stored within a SAA (though it can be).
 - o Waste oil shall be collected in the waste oil drum (located between the NSLS west roll-up doors).
 - o Oily rags that are not contaminated with solvents or other chemicals shall be collected in a fireproof container. The container shall be labeled with a green label. The contents shall be bagged, labeled with a green label and brought to the 90-day Storage Area for disposal.
- Use of degreasing products other than "LPS degreaser," "AC-500" and "Zep-Pride E" must be assessed by the Safety Officer, the Industrial Hygienist or the Environmental Compliance Representative (ECR) to determine whether they contain chemicals that will cause a waste concern.

Response to Leaks/Spills: Keep absorbent socks around the base of machines with coolant reservoirs that show evidence of leaking. If a spill of oil or other chemical product occurs, take prompt action to

¹ Federal regulations for hazardous waste are contained in the Resource Conservation and Recovery Act (RCRA).

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prevent it from discharging to floor drains or sinks. You can clean up small spills on your own if you are familiar with the hazards present and are comfortable doing so. Otherwise, contact a member of the PS ESH Staff, or for those in Building 725, contact the NSLS Control Room Operator (x2550). Any spill that occurs outdoors, impacts a drain or entails >5 gallons of oil must be reported to the Lab emergency response number (x2222) and, for those in Building 725, to the NSLS Control Room Operator (x2550).

Your Role and Responsibility: You are responsible for the proper management of your waste and to take prompt action in the event of spills. If you are ever in doubt regarding the proper course of action, contact your supervisor or a member of the PS ESH Staff for advice.

Potential Regulatory and Environmental Impacts: Mismanagement of waste can result in violations of RCRA hazardous waste regulations. Discharge of oils and other chemicals to drains can result in violations of BNL's sanitary release limits. Both can ultimately result in contaminated soil or groundwater. BNL is subject to fines and penalties for such violations, and is responsible for the clean-up costs associated with any required remediation. BNL has also suffered poor public perception due to poor waste management practices and contamination events in the past. Proper management of waste and spills will help us maintain a positive relationship with regulators and the public.

Pollution Prevention and Waste Minimization: Cooperate with PS's recycling efforts by collecting scrap metal, glass and plastic that you produce and deposit it in its respective container for recycling. Please offer any suggestions and comments to your supervision regarding ways to reduce hazardous waste generation. Disposal of hazardous waste is costly and time consuming. Please make every effort to minimize the quantity of chemicals you bring to the PS Directorate.

