

Webber, Jeanette

From: Faro, Christie
Sent: Monday, November 25, 2024 10:08 AM
To: Webber, Jeanette
Subject: FW: Hazardous Waste Regulations

Importance: High

Below is the first email that we sent out in the spring. Then if they did say they created waste, we'd send the next email out with how to comply with the hazardous waste rules. Basically, if a facility is creating hazardous waste, they need to notify as a hazardous waste generator. Some practices already had existing EPA ID#s because they had historically been notified as hazardous waste generators when they were using traditional xrays and disposing for their silver contaminated fixer. If they were just reactivating their ID, they didn't owe any fees to do that. If they never had an EPA ID#, they'd need to pay a one time \$150 fee to get their EPA ID#. Then they have to submit an SQG form and fee (only \$90 per year charged from when we reached out in 2024) that requires them to verify that they are managing and storing their waste according to the hazardous waste rules. These rules are not new, NH SQGs (federal VSQGs) have been required to comply with the hazardous waste rules since at least the 80s and the NH SQG Self-Certification Program since 2004 (along with the fees, but we aren't back charging anyone), its just that we weren't aware of this waste stream until the other national practices were notifying. Then we realized that other practices had this waste too, but ultimately, it is the businesses responsibility to ensure they are and have been disposing of their hazardous waste legally.

We had about 20 veterinarian practices that were notified for hazardous waste activities on their own prior to this outreach and then through the outreach we found about 115 practices that were creating hazardous waste (mostly all flammable methanol based lab waste that was evaporated, mixed with kitty litter or pee pads and thrown away). A few more that I'm still trying to get information from, and about 65 that said they weren't creating hazardous waste (rescues, spay/nature clinics only, digital pathologists, they send slides out, don't use methanol, or don't do tests that require chemicals on site). But the majority were mixing their hazardous waste with kitty litter or pee pads and disposing of it in the trash.

This email below has some links that may be of interest too.

From: Faro, Christie
Sent: Monday, March 18, 2024 10:59 AM
Subject: Hazardous Waste Regulations

Good Afternoon,

I was reaching out because New Hampshire Department of Environmental Services (NHDES) has become aware that Veterinarian practices in NH may be creating hazardous waste and improperly disposing of it. Specifically, flammable solvents (like methanol fixative) from the staining process. This waste must be collected and managed as hazardous waste and is not allowed to be disposed of by mixing with solid waste, down the drain, or with pharmaceutical waste destroyers. There are other potential waste streams that may need to be managed as hazardous waste as well. Please take a look at the fact sheets below to evaluate the waste created by your practice to see if they need to be managed as hazardous waste and if your practice needs to become notified as a NH Small Quantity Generator (SQG) of hazardous waste.

NHDES Veterinarian Fact Sheet:

<https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/2020-01/hw-9.pdf>

Other Veterinarian Resources:

<https://www.vetca.org/hazmat/hazoverview.php>

<https://www.vetca.org/hazmat/hazdeterm.php>

Here is a link to the SQG Website with information on the SQG program and links to some fact sheets that may explain the regulations more and what is required of hazardous waste generators:

<https://www.des.nh.gov/waste/hazardous-waste/generation-and-compliance/small-quantity-generators>

Please respond to let me know if you do have flammable fixative waste and what you do with it, as well as with any questions on the regulations (waste container suggestions, etc.) and what the next steps would be.

Thanks,
Christie

Christie Faro
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